COMMENTS ON ANY FURTHER INFORMATION / SUBMISSIONS RECEIVED BY DEADLINE 4 AND RESPONSES TO WRITTEN QUESTIONS (EXQ2)

Cowfold Residents' Comments at Deadline 5

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Contents

Throughout this document, Action Points and their responses are shown in green, and the ExA Written Questions and the responses in purple.

1.Traffic:

Comments from Shermanbury and West Grinstead Parish Councils show just how little engagement there had been with local communities when this substation site was chosen. What may have looked like a great idea as a desk top exercise, is proven to be wholly inappropriate and demonstrates a lack of thought or of understanding of the local roads:

REP4-123 Shermanbury PC:

"Shermanbury Parish Council considers it inappropriate and unnecessary for the vehicular traffic generated by Rampion 2 to use Kent Street.

The use of Kent Street for site access would result in nothing less than environmental vandalism!

B2116 Partridge Green Shermanbury Parish Council is alarmed by the apparent assumption that the B2116 is a rural backwater with little traffic. The road is extremely busy, travelled by the only regular bus route, and is the main access to a range of local shops, medical facilities, pubs, and a school. The road also is widely used by commuters ***attempting to circumvent traffic delays on the A272****."*

REP4-134 West Grinstead PC:

"West Grinstead Parish Council strongly objects to the proposal to put in the Rampion 2 pipeline the B2116 between Shermanbury and Partridge Green using an open cut crossing. We believe it should be by way of a trenchless crossing, in line with the planned crossing of the B2135. This would save considerable inconvenience to the many people who use the B2116. Under no circumstances should the road be temporarily closed as suggested in Schedule 3 to the draft DCO. Partridge Green lies in the parish of West Grinstead. It has a population of about 2,200….

As matters stand, the intention is to use a trenchless crossing of the B2135 south of Ashurst. Whoever decided to do that and not do the same with the B2116 cannot have known the roads in question. It must have been part of a desk-top exercise. The decision is so illogical as to be almost perverse."

A272 General:

From the outline CTMP (REP4-046), we still see:

- Table 4-3 A62 still showing ENSO average speed as for A61 and A64 even though it is on the A272 and not Kent Street.
- Table 4-4 still no clarity regarding HGVs over 3.5T and whether they are classed in this as HGVs or LGVs
- Table 5-1 still showing 13 and 15 routing through Cowfold, contrary to c157 and 158
- 7.6.6c still showing access routes through Cowfold

- In Appendix A: Access proposals: A62 is still described as 'no construction needed as existing access'; but this is not true as access will be needed into the compound from the Oakendene Industrial Estate road, with removal of fencing, hedges and a large tree (See REP4-044 figures 7.2.1k and 7.2.6n). **We have grave concerns about the safety of this proposal as traffic will have to cross the path of the vehicles entering and exiting the Industrial Estate.** Appendix D para 3.4.3 indicates now that the details of this access will not now be available until *after* the examination. Given the concerns about the safety of this junction, raised by us and Cowfold PC, this is not acceptable when assessing the feasibility of this proposal.
  Please note, the northern end of PRoW 1786 as it approaches the A272 cuts through this compound. The re-routed PRoW runs across the entrance to the compound, with attendant danger for pedestrians and other users. This does not seem to have been considered in the assessment of the access point at all. (See Doc Ref 2.5, access rights of way and street plans, sheet 33). We also question whether this locally important PRoW will remain open where the mitigation planting is proposed, south of the manor house.

A58: 'width of access road 5m'. This may be true at the bell mouth but is *not* true further down, as seen at the ASI; the ExA will be aware of how narrow the lane is, and the pinch points between houses.

WSCC also pick up many of these inconsistencies.

TA2.6 Use of Narrow Unclassified Roads: Outline the controls in place in the latest versions of the Outline Construction Traffic Management Plan [REP4-045] and Outline Construction Workforce Travel Plan [REP3-031] to prevent construction vehicles using unsuitable narrow unclassified roads. Comment on Bolney Parish Council's request that all such roads are specifically named in each document [REP4-102]:

Our response:

In REP4-102 Bolney PC raise concerns about the congestion which will occur on A272 as a result of the HGV movements and the use of sideroads to avoid it:

"REP3-031 is the Applicant's revised Outline Construction Workforce Travel Plan. This has been amended and now states that the Travel Information Pack which the Applicant will prepare to issue to the workforce will 'advise those driving to the site of recommended routes to avoid the use of narrow unclassified rural roads, ***where possible****' [emphasis added]. Bolney Parish Council contends that this wording is wholly inadequate and falls short of the Applicant's response in REP2-14. Again, the Parish Council would ask that the Outline Construction Workforce Plan be amended to specifically name the five rural lanes in the Parish as being prohibited from use by LGVs and construction workers.*

We also request the same for Bulls Lane, Picts Lane, Thornden, Kent Street itself. We know that otherwise they will inevitably go where google maps or colleagues tell them to go to avoid the congestion Rampion will be creating. Monitoring and sanctions need to be in place.

Modelling:

AQMA modelling:

- *"HDC have concerns regarding modelling results, as Cowfold worst-location (DT37) is still underpredicting by 24.5% even after modelling results were adjusted.*
- *HDC concern is that with this monitoring location being severely underpredicting, the conclusion of AQ impacts at the worst-location will not be valid. (REP4-084)"*

This mirrors the concerns we raise about the inadequacy of the Air Quality modelling in Modelling Assumptions for Impact on Cowfold AQMA (p 44 REP3-099). **Please also see the summary of the TPA traffic report in Appendix 1 below.**

Receptors:

Whilst they include the school as a receptor, we wish to point out that on the A272 on the eastern side of Cowfold, between Cowfold and Oakendene, there is a **scout hut and a playground**. Mothers with push chairs cross the A272 at this point to reach the playground, as do children often on their own, on their way back from school. In addition, **there is a school coach collection point and drop off at the car park adjacent to the playground.**

More than half of the population of the village have to cross the eastern A272 to access key services such as the local shop, school, Allmond Centre and surgery.

Traffic flows:

From the Applicant's Post Hearing Submission (REP4-072, 7a) Kent Street Traffic Management Strategy:

In relation to impacts on traffic flows along the A272 and in the vicinity of the Oakendene Industrial Estate, "*the Applicant confirmed that it had considered this and had confidence that the Kent Street Traffic Management Strategy will not lead to concerns with the overarching Construction Traffic Management Plan [REP3-029].*"

This does not tell us *why* this is acceptable; just because they say so, does not make it true. They do not give any evidence to support this statement.

No evidence has been provided by the Applicant to demonstrate the impacts of *turning* traffic, either at the Oakendene Industrial Estate, or indeed any of the other turnings, A63 and Kent Street, and the additional, complicating fact that they are so close together.

Cowfold PC also raise this issue, and the fact that there has been no survey for the *current* usage of the Oakendene Industrial Estate. We know that traffic monitoring tubes were placed at the entrance before the last ISH. Where are the results?

Detailed discussion of AP 58, 46 and 57:

The following comments are based on the Applicant's response to Action Points arising from ISH2 & CAH1 (REP4-074):

AP58 The Applicant to provide a response on the traffic movement discrepancies discussed during ISH2 for accesses A62 and A63.

Applicant's Response: *"The peak week construction traffic flows for all access junctions is provided within Table 6-8 of Appendix 23.2: Traffic Generation Technical Note, Volume 4 of the Environmental Statement (ES) [REP3-021] with these number forming the basis of assessments provided in Chapter 32: ES Addendum, Volume 2 of the ES [REP1-006]. This shows that Access A-62 will serve approximately 866 vehicles during the peak week of construction activity and A-63 will serve 900*

vehicles. During these peak weeks, 612 light goods vehicles (LGVs) will use access A-62 (306 in each direction) and 564 LGVs will use access A-63 (282 in each direction).”

Our response: There is nothing here which explains *why* there are discrepancies. These are weekly. figures, but compare them to the Rampion 1 documents **(See below and Appendix 2)** which give *daily* numbers for LGVs alone of 250 (this would equate to 1250 per week). Rampion 2 is a much bigger project, and in addition, the compounds are to be used as holding bays for the cable route traffic and materials, whereas for Rampion 1 they went straight to the cable route. See also single v double occupancy below.

Appendix A of REP4-074:

Action Point 46: “The Applicant to provide a notice on the impact of the proposed Kent Street traffic management strategy on the overall traffic modelling for the Proposed Development”; and Action Point 57: “The Applicant to submit into the Examination and provide Cowfold Parish Council with details of turning movements at all junctions and proposed accesses along the A272”.

Our response:

Traffic flows

Para 1.2.4:

- 25% HGVs through Cowfold is now supposedly a worst-case scenario, without convincing evidence as to how this has been achieved, and there are still discrepancies between this and the flow diagrams etc
- LGVs include workers arriving in *single occupancy* vehicles compared to Rampion 1 double occupancy and therefore private car numbers should be considerably larger.

Table 2-1: peak week 83. HGV figures are 34 for A63 and 0 for A62 but just a month ago they were saying to Cowfold PC that 39 HGVs would go through the village centre; see REP3-052 para 2.3.28 (“*The assessment of peak construction traffic flows at receptor E ‘Bolney Road, east of A281’ …shows a construction traffic flow per weekday of 89 vehicles, of which 39 will be HGVs”).* On what basis have they reduced the numbers?

From Table 29.6 in the Rampion 1 document (Appendix 2 below) gives daily HGV numbers of 30 for excavation and foundation works *alone* for the much smaller Rampion 1 substation, and para 29.5.40 says “*the maximum number of HGV deliveries into the onshore substation site in any one day will not exceed 40 vehicles.”* **How therefore can Rampion justify the figure of just 34 HGVs/day at the substation compound during the peak week**?

If there are 34 HGVs at A63 for the peak week and 90 total vehicles, then there are 56 LGVs/day in the peak week. Table 29.8 in the Rampion 1 traffic document gives peak week LGVs at the substation of **250/day**. **Again, how can Rampion justify their LGV numbers?**

Also, we see that for week *125, the TOTAL* vehicle numbers between the 2 compounds and total vehicle numbers, is 151; far more in fact than for week 83, supposedly the biggest peak week. There are probably other weeks when the total numbers far outweigh this also, so we do not get a realistic picture of how bad the traffic actually will be for how long.

Similarly, paragraph *3.1.5” On the basis of this assessment, the Kent Street Traffic Management Strategy does not impact upon peak week construction traffic movements on the A272 west of Kent Street.”* We do not agree with this because the impact is not just on traffic flows but these vehicles

must be added to the other vehicles going in and out of the compound over time to get a true sense of the cumulative impact of repeated disruption over time with the delays and congestion caused.

Weeks 160 and 162 need to be updated as for the Kent Street HGV management plan to reflect the fact that A62 will hold HGVs going to and from Kent Street; in fact they are-see table 3-1. **However, there need to be at least 3 movements for each of these Kent Street vehicles, not 2** (to A62, from A62 to Kent Street and back out of Kent Street); 4 if they are going back to A62 after leaving Kent Street again. Each time there is a junction involved, the traffic flow on the A272 will be impacted.

2.3.6: an average of 1 vehicle entering or leaving every 4 minutes will bring the A272 to a standstill. They won't in fact be evenly spread, but clustered. Also, we do not know, because they have not provided Cowfold PC with *current usage* figures for the Oakendene Industrial Estate, as requested, what impact this will have on the access to the Industrial Estate. Furthermore, cutting across the Industrial Estate access road will result in collisions.

2.3.9: 1 vehicle every 4-5 minutes at A62 *and* every 6 minutes at nearby A63 will be chaos!

2.3.15: The statements made about A62 generating only 8 HGV movements during peak week 160 is not possible due to the additional HGVs being held at A62 prior to accessing Kent Street, and should be removed. It shows that the Kent Street strategy numbers have simply been tacked on with no proper thought. Actually, the paragraph states "*with only Accesses A-62 and A68 in use with these generating 8 HGV movements in total"* yet the table shows the compound is A63 not A62; this should be clarified.

Table 2-3:

Why aren't the figures for the A272 west of the A23 the same as for the week 83 figures in table 2-1. Even using flows from Table 2-2, the numbers just do not add up.

It is too simplistic; a proper assessment of the impacts on traffic should be carried out, particularly as

- HDC raise concerns about severe under prediction of AQ impacts,
- the size of the vehicles on Kent Street are disingenuously described as HGVs when in fact many are AILs. We have gone from 'a single-track lane unsuitable for HGVs' to having to take the brunt of many of the very largest vehicles. The movements in and out of Kent Street and the compound will not be straightforward and their passage along the A272 may require holding up the oncoming traffic if they are too wide to allow HGVs to pass.
- No assessment has yet been done of the current usage of the industrial estate access, as Cowfold PC requested,
- They have done a basic minimum here; just traffic numbers; For Action Point 46 they have not looked at the impact on traffic *modelling, of the movement of these huge vehicles in and out of the various access points, or the impact of the 40mph speed limit on the* A272. For 57 they have not looked at the *impact* of these vehicles turning in and out as they wait to cross the oncoming traffic etc
- The numbers simply do not add up, particularly with regard to LGVs when compared to Rampion 1, but for HGVs also

Have the initial weeks, where construction of the compounds themselves takes place, been included in these numbers, or in the case of A61 and A64, the construction of the haul roads? Presumably not as Rampion say they will sort out the details post consent. Similarly, any enabling

work for Kent Street will not have been factored in. We also have no indication of whether there will need to be road closures, traffic lights, etc to facilitate these works.

Rampion 1 documents:

See Appendix 2 below.

Para 29.5.40: Over the entire construction period it is expected that, even taking into account any daily fluctuations, the maximum number of HGV deliveries into the onshore substation site in any one day will not exceed 40 vehicles.

*Construction Worker Trip Generation - **Onshore Cable Route***

29.5.42 daily personnel at each TCC :15 minimum

Table 29.7 max daily personnel 23. Based on dual occupancy of vehicles, this equates to a max of 24 worker trips (one in each direction) per day

As can be seen from App 29.6 *none of them* came along the A272. In the case of Rampion 2, ALL will do so as they are to park at the compounds first and then be taken to their place of work. This must increase the number of total movements per day.

*Construction Worker Trip Generation - **Onshore Substation***

*29.5.47 During the construction phase of the onshore substation, the maximum number of workers expected to be on site during the peak construction period is **250.***

Table 29.8 presents the estimated workforce during the construction of the onshore substation over a two-year period. With an average number of workers on the site per day ranging between 15 and 60 depending on the stage of construction.
It is quite clear, that, even before adding on the workers travelling to the cable routes, these figures are far more than those given by the current applicant. For a project several times the size of Rampion 1, the applicant needs to explain how this is possible.

In addition, it is clear from paras 29.5.49-51 that the cables were delivered via enormous vehicles which may struggle to get down Kent Street and the small bridge over the culvert, which is barely 2.8m wide. The weight of over 50T is also unlikely to be tolerated by this tiny road. It is also clear that a crane needed to be present to unload each delivery, presumably also needing to be factored into the vehicle numbers.

29.5.52 Table 29.5 indicates that around 360 cable deliveries may be required across the whole cable route, with the section experiencing the highest volume being section 4 with 72 deliveries. Section 4 (see table 29.5) is a trenchless crossing, as we see at Cowfold stream. It can also be seen from this table that the numbers of HGVs at each section varies enormously. How many cable deliveries will be needed for each section of the cable route and what is the number of each type of vehicle going to the cable routes at A61, A64, A56 and A57?

With regards to the impact of traffic turning on and off the busy A272, it is clear from App 29.6 that none of the Rampion 1 workers, whether going to the cable routes or the substation site, arrived from the A272 and therefore did not contribute to traffic flows on this road, or turning impacts.

The figures given by Rampion 2 are therefore not credible, and therefore should be challenged by careful scrutiny of the bill of quantities.

40mph proposals. WSCC speed limit policy:

Rampion are proposing a speed limit reduction on the A272 to reduce visibility splays and facilitate the movements of their huge vehicles in and out of Kent Street.

Typically, a speed limit reduction would need to be supported by survey data demonstrating that the 85th percentile speed is lower, or the provision of a suitable traffic calming scheme or similar which changes the environment and therefore the behaviour of drivers. A measure such as average speed checks should be considered to enforce the temporary speed limit. Why are there no details about this? Drivers would slow down after Bolney but then see no reason for the speed change and so speed up just as it becomes important to slow down for all the access points and turning places near Kent Street.

We believe a speed *survey would probably support a reduction to 50mph using 85th percentile data, but it has not been done. Yet this is crucial as the splays, the ability to turn in and out etc all depend on this!* It is what residents have been asking for, for years, but WSCC have always refused. We are therefore puzzled by their apparent ready willingness to accept a *40mph* limit without further question, and no assessment of

- the potential impacts on the congestion, or
- the safety in other parts of the A272, or even
- how enforceable this is likely to be.

We show below some extracts from WSCC's Speed Limit Policy:

"1.9 However, it is advised that speed limits alone should not be used to attempt to protect VRUs or to solve the problem of isolated hazards (such as single road junctions or reduced forward visibility such as a bend or hidden dip). In these circumstances if speed limits are to be used, they should be considered as part of a package of supporting measures to manage vehicle speeds and improve road safety.

Route Length Assessment

2.9 The objective is to achieve a balance between providing reasonable consistency of speed limit along a route and the need to encourage awareness of lower speed limits appropriate for changes in character or 7 where risks are higher. Exceptionally lengthy sections of speed limit where the functional hierarchy does not support the lower limit or multiple changes of short sections of speed limit along a route should be avoided.

2.10 The recommended minimum route length for a speed limit is 600m

3.16 Requests for speed reductions on single carriageway rural roads should be assessed against the functional hierarchy / route assessment at 2.5 to determine an appropriate speed limit. Potentially that speed limit could be: ***50mph on "A" and "B" class roads"***

Transport Planning Associates Briefing Note:

In an attempt to address some of the failings of the assessments of transport impacts so far, we have commissioned a report from TPA which confirms many of our concerns. **(see Appendix 1 below).**

We do not have the means as private individuals to fund the necessary further assessments of turning traffic or on the already congested A272 and the Cowfold mini roundabouts, but Rampion should be obliged to do so. Without this, you cannot make an adequate assessment of impacts. All local residents, including parish councils, are warning of the dire impacts this project will have on traffic, from their lived experience. If Rampion are saying otherwise, then either their surveys are flawed, or insufficient.

Employment:

One of the forgotten impacts of the traffic is the effect on the many local businesses.

Because they refuse to accept there will be any impact on traffic, Rampion have also totally ignored the inevitable impact on the thriving Cowfold economy.

We remind the ExA that there are around 130 businesses in Cowfold which could be negatively affected by the additional congestion, loss of business, delayed deliveries, and diversions using adjacent lanes. From a wider perspective, over 18,500 road users would be severely inconvenienced by sitting in unnecessary queues as they approach the village of Cowfold every day. The loss of productivity, delays in receiving supplies and loss of business as people are put off from visiting as a result of the traffic congestion, could be catastrophic. The Oakendene industrial estate is a significant provider of rural employment in this area, yet it faces extinction as a result of the traffic delays and construction compounds required to be navigated in order to access it. (Please see our Local Impact Statement REP1-089, section 5). Wineham Lane has only a handful of businesses. Again, this is a factor in the consideration of the alternatives which has not been taken into account. The turning to Wineham Lane off the A272 is not close to the mini roundabout congestion point on the A272 and so does not impact the general traffic in the same way.

There has been no focus on this at all so far in the examination, yet the impact on the economy will be severe, both locally, and the wider economy, as this is a major trunk road across the county.

They also failed to properly engage with the hard-to-reach group of small businesses at the Oakendene Industrial Estate during the consultation. Worse than this, they did not even send them their Section 42 letters until after the first consultation, ie until after the decision to use Oakendene was made, as we demonstrated in our Adequacy of Consultation submission.

Rampion have not considered the impact of the construction traffic on the economy of Cowfold and the wider community. Neither have they weighed this in the balance when choosing the site. Rather, they have focussed on the largely tourist economy of the South Downs and Coastal areas.

Even with regards to tourism, 2.1.17 of Applicant's response to deadline 3 submissions (REP4-070) continues to regurgitate the same statements about Bournemouth and Rampion 1, and to deny there will be any impact on tourism. We have robustly critiqued these claims in our Local Impact Statement and we agree with WSCC (paras 2.1.19 and 20 of REP4-070) that the Applicant has ignored any suggestions that proper surveys are carried out to assess this.

2.Kent street:

It is difficult to get across the extent of the widespread community outrage about these proposals. For the residents the stress is enormous; we hear reports of the cumulative mental health impacts, with residents unable to sleep, in tears, fearful for how they will be able to continue to conduct their lives. This ancient medieval lane, which time forgot, now finds itself under siege.

Construction:

From the Applicant's Post Hearing Submission (REP4-072, 7a) Kent Street Traffic Management Strategy:

- *"The Applicant confirmed that the land needed for the passing places and junction widening is within Order limits and so no more land would be needed. The passing places were understood to be within highway land, which the Applicant has confirmed at Deadline 4 in response to Action Point 38 in the Applicant's Response to Action Points Arising from ISH2 and CAH1 (Document Reference 8.70)."*
- "*The Applicant confirmed that it had not carried out a detailed structural assessment of Kent Street at this stage but noted* ***that Kent Street does not currently have a weight limit*** *and so can be assumed to be suitable for the proposed HGV movements.*"

No, it can't; it *does* have a width restriction, which would automatically exclude vehicles of this type and size.

- *"Should works subsequently be required to strengthen Kent Street,* ***these can be undertaken under the powers contained within the Draft Development Consent Order [REP3-003]."***

Yes, we know Rampion seek the right to do this, but no consideration has been given as to *how* they will do it without major disruption to residents and users of the lane.

- "*However, as the Applicant was not aware of a need for strengthening works so none have been proposed at this time."*

In other words, "we will ignore it and bring it up as an 'unforeseen' issue post consent". This is unacceptable.

- *"The Applicant confirmed it would consider the contingencies which would be in place in the event of a sudden failure of Kent Street during construction and respond at Deadline 4. This has been provided at Deadline 4 in response to Action Point 39 in the Applicant's Response to Action Points Arising from ISH2 and CAH1 (Document Reference 8.70) ."*

In fact, the response to the action point shows the Applicant has chosen to ignore this issue:

AP39 Applicant to provide a proposed contingency plan for the repair of the carriageway of Kent Street during construction activities in the case of a carriageway failure:

Our Response: The applicant's response is simply to say that the power to undertake such work is covered by the DCO. This is to totally miss the point, which is HOW are they going to make life possible for the residents during this dreadful disruption? Just saying that they have the power to

repair under article 10 of the DCO does not provide any reassurance that the road will actually remain passable and how the repairs will be carried out without disruption.

Passing Places:

From the Outline CTMP para 8.2.6: Kent Street passing places are now supposedly big enough to take HGVs, but no evidence is provided to back this up.

The swept path analyses of the passing places are insufficiently detailed:

Diagram number 1 has no measurements on it at all and none of them show the location of the ditches which run down the sides of Kent Street. The length of the passing places appears to be only 12.5m whereas the length of the HGVs is shown as from 16.5m to over 26m.

Number 2 appears to go through the hedge, and is only 2.4m wide. The vehicle widths are up to 2.85m.

Number 3 does not give the width of the passing place at all.

Number 4 also appears to encroach on the hedge, and the passing place is only 2.5m wide. The passing place appears to start on the bridge/culvert. This needs to be clarified, as it will not be possible to expand in the way suggested. NB this is also a dangerous point for kettling horses as it will feel extremely enclosed (see section on horses, cyclists and pedestrians below). Worse still, there is a deep ditch just off the road here into which a horse box fell in an attempt to give way to an oncoming vehicle.

AP40: Applicant to confirm the construction details of the proposed passing places on Kent Street, whether they would be removed at the end of construction activities and if so, how the lane would be returned to its former nature and character.

Our Response: Again, the AP is ignored. To say that the details of the passing places will be dealt with post consent is unacceptable for something so significant to both amenity and landscape impacts.

The current state of the road is not able to withstand such traffic and heavy traffic, how can this road be reinstated without closure. How can the road widening / passing places be constructed without closing the road – items not thought about by the Applicant.

3.4.6 *Up to four temporary passing places are proposed along Kent Street between the A272 junction and access A-61. These passing places are located within the West Sussex County Council highway boundary and fall under Work No.13 (Temporary construction access) on the Onshore Works Plans [PEPD-005] which is defined with the Draft Development Consent Order [REP3-0036] as 'temporary construction access including creation of visibility splays and vegetation clearance'*.

This will require more than just vegetation clearance; for more than 6 months of the year, the verges are boggy and unsafe, unsuitable for vehicles or animals, without getting bogged in. This will therefore require the laying down of a hard surface, destroying the vegetation permanently, not just 'clearance'. Similarly, the existing informal passing places mentioned in 3.4.7 are unsuitable for many months of the year. In addition, new passing places opposite them will create an apparent appearance of the road as something wider even than the A272.

There has been no assessment of where the ditches are, which are vital to prevent flooding of the road and surrounding land and cannot simply be filled in. There are ditches at variable distances from the road side all along the road.

For the summer months, the vegetation along the verges of the lane is high and enclosing, making the lane even narrower than it is in winter or when the ASI took place, and emphasising the unsuitability of using such a small lane. To keep the verges down will require an appalling degree of 'vegetation clearance'.

AP38 Applicant to clarify whether the proposed widening of the western kerb line of Kent Street at its junction with the A272 and 4 passing places are on highways land or private land and within the order limits.

Applicant's Response: "*The Applicant can confirm that the proposed passing places are located within the proposed DCO Order Limits and West Sussex County Council highway boundary. The widening of the Kent Street carriageway on approach to the A272 is also within the West Sussex County Council highway boundary.* "

Our response: WSCC do not seem to agree: "The passing places are noted. The extent of public highway varies along Kent Street as such it's not a given that these are within the highway. The highway boundary would need to be determined and shown on the relevant drawing alongside the proposed passing places. Confirmation would be required the passing places are also within the DCO Limits**."**

In addition, the following email correspondence with Jamie Brown, WSCC highways officer, on 15 March 2024, strongly suggests there is not the clarity Rampion would like us to believe:

"Having checked my records, I can confirm that West Sussex County Council has no ownership along this length of Kent Street. On the west side of the road the highway boundary is recorded to be between 1.0 to 6.4 metres back from the edge of the carriageway along this section of road. On the east site the highway boundary is between 1.5 to 6.0 metres back from the edge of the carriageway, when this location was surveyed for maintenance purposes on 15-09-1987.

In the absence of any WSCC ownership, on the ground, the highway boundary is formed by the edge of the ditch nearest to the carriageway on both sides of the road."

In some places along the lane the ditch is very close to the tarmac in fact.

Also, if there is indeed such clarity, why are they still pursuing Affected Parties for rights over the verges? (see entries for 027 and 036 in the Land Rights Tracker REP4-012) and in the Book of Reference.

A272/Kent Street Junction and Access Points:

A272/Kent Street:

3.2.11 "*Table 3-2 shows that all construction vehicles can complete all manoeuvres [at the Kent Street A272 junction] in all directions. Both Articulated HGVs and Low Loaders would require* ***the use of banksmen****, particularly in performing the left turn out of Kent Street onto the A272".*

They denied the need to use banksmen on the A272 at the hearing, and indeed further down the same document, paragraph 3.4.11 says "*In order to facilitate the Low Loader movements turning right in and left out of Kent Street, some local widening will be required on the western side of the*

Kent Street approach to the junction, as depicted in Drawings 62280651-WSP-XX-XX-DR-TP0100-01319 and 62280651-WSP-XX-XX-DR-TP-0100-015 to 018 in Appendix D. The full extent of the proposed widening falls outside of the West Sussex County Council highway boundary but within the proposed DCO Order Limits and allows all construction access manoeuvres to be ***undertaken without the support from banksman*****.** " **This latter is in direct contradiction to Table 3-2 and para 3.2.11 above.** It shows they are just making up details as they go along; none of what is claimed can be seen to be credible without good supporting evidence. What is more, if no banksmen are used, how can the traffic on the A272 safely be managed whilst vehicles are making these manoeuvres?

We also have concerns about the ability to make the left turn onto the A272 as the swept path diagrams show wheels in the verges, and therefore, unless completely accurate, the reality may be that the hedge on the northern side is destroyed. **The hedge and trees are named as H68 and G193, listed for root protection, and in any case fall outside the DCO boundary.** However, we note that, compared to the original diagrams in REP3-030, **the DCO boundary appears to have been moved to the north of the hedge line north of the A272 on both side of the Picts Lane junction.** This is also contrary to the plans in Sheet 33 of the Onshore Work Plans. We would be grateful if the ExA could seek clarification of this as a matter of urgency.

What is the accuracy of the swept path drawings and how accurate are the plans on which they are drawn?

WSCC also pick up on the potential lack of accuracy: "*Clarification is needed whether the A272 road widths on the tracking drawings are accurate. The drawings appear to show the A272 being quite wide. The actual lane widths appear to be no more than 3.5 metres in each direction. The A272 does widen in the vicinity of the Kent Street junction but only to accommodate a taper at the Picts Lane junction opposite."*

A62, A61 and A64:

Paragraphs 3.4.3 and 4 tell us that they will not be producing detailed designs of access points A62, and A61 and A64 until after deadline 5. This is unacceptable as the traffic and landscape and visual impacts are significant and cannot reasonably be left for discussion until such a late stage. Worse still, Appendix A is still saying 'existing assess no alteration needed' for A62.

At deadline 4 however, WSCC say: " In light of the Oakendene compound being used as a holding area for HGVs, tracking drawings are required to demonstrate the adequacies of the existing A272 junction." This is such a significant pin of the whole project; it cannot be left until post consent. We already know that there must be hedge and tree removal to access the field (Compound A62) *from* the existing access to the industrial estate. This will have ecological and landscape implications, but in addition to this, all vehicles accessing the compound must *cross* the path of vehicles going in and out of the industrial estate. **This has major safety implications which have not been addressed at all so far. Will banksmen be required here also?**

3.4.20 *Swept path analysis has also been completed for Low Loaders as the largest construction vehicle anticipated to require access to accesses A-61 and A-64. This shows that access to / from the north is feasible, noting that such movements would also be managed by banksmen. The outcome of this swept path analysis is shown on drawings 62280651-WSP-XX-XX-DR-TP-0100-019XXXXXXXX provided in Appendix D.*

It does not show us anything of the sort; these are very scrappy diagrams, which do not carry any conviction that the turning in and out of A61 and A64 is actually possible, nor does it give any indication of the amount of hedge and tree loss.

AP48: The Applicant to **demonstrate** using swept path analysis that HGVs would be able to enter and exit accesses A64 and A61 within the proposed Order Limits.

The swept path diagrams for A61 and A64 are sketchy at best; they are not convincing, for something so crucial. Why, if they have supposedly done this accurately, can they not produce detailed designs of A61 and A64 *now*? The truth is they are leaving so many of the difficult decisions until post consent so they cannot be shown for the damaging, destructive plans they actually are.

Kent Street Construction Traffic Management Plan (based on Appendix D of REP4-046):

3.2.3.*'Kent Street provides access to a number of PRoWs'*. This fails to appreciate the fact that, although a lane, Kent Street ***is*** effectively a PRoW itself, and must be managed in this way as well as for traffic, for any management to be successful. To be able to produce any kind of meaningful management plan for Kent Street, **the Applicant must do a proper NMU survey.**

We note they have still not produced even a traffic survey of their own, relying on the flawed, and extremely short, Enso Energy survey. **Please see Appendix 3 below for a further discussion of this**.

3.3.2 and table 3-3 show that there will be *"approximately 1,750 construction vehicles using Kent Street in each direction over the course of the construction phase".* **ie 3500 total heavy vehicle movements.**

3.3.7 These figures do not give an indication of the true picture as they do not factor in the sheer size of these vehicles and the extremely low current usage by such vehicles. The effect on the lane will be far more than it was designed to bear. The 6'6" width restriction would automatically have excluded such heavy vehicles in normal circumstances; it has never had a reason to be tested.

Clarification is requested as to whether the cable drum HGVs are classed as abnormal loads. These would appear to be so by virtue of their length. So, this tiny lane, deemed unsuitable for HGV access in the early stages of the consultation, is now to be used by numerous AILs ie the biggest possible vehicles. Surely, even more unsuitable!

Also, reading 3.3.6+7 very carefully, it is clear that there are in fact **multiple peak weeks,** otherwise the numbers simply do not add up, based on a single peak week for each access, and 13 weeks of 10 HGVs a day. In fact, the peak weeks are repeated, an unspecified number of times for 38 not necessarily continuous weeks. (3.3.5: "*There are multiple peaks in construction traffic for accesses A-61 and A-64,* ". We feel this is a deliberate attempt to disguise the fact that there are multiple peak weeks and to make the situation appear less harmful than it actually is.

This will be intolerable for the residents of this tiny lane; 2-3 HGVs per hour, requiring the halting of other users will be enormously disruptive, and is the result of a poorly thought-out proposal, when a far more suitable access at Wineham lane exists. Read this in conjunction with the submissions by equestrian users of the lane and you will se that this will not easily work as Rampion suggest it will.

Passing Places:

From REP4-072 applicant's post hearing submission:

"If a non-construction HGV were to enter Kent Street when a construction HGV is leaving, the Applicant confirmed that the passing places would act as the failsafe to allow two-way traffic movements. The Applicant understood that there would be sufficient width to enable this to occur but that it would clarify this at Deadline 4. This has been provided at Deadline 4 in response to Action Point 41 in the Applicant's Response to Action Points Arising from ISH2 and CAH1 (Document Reference 8.70). The Applicant noted that there was sufficient width in the cable corridor for HGVs to enter, turn around and exist from site. "

In fact, the diagrams of the passing places show several of them are narrower than the width of an HGV, so there is no convincing evidence that two HGVs could pass each other.

AP41 Explain how vehicles not related to the Proposed Development turning into Kent Street would be managed in combination with HGVs already dispatched from the Oakendene West Compound to accesses A64 and A61 in the Lane. In addition, confirm the size of vehicles that could pass each other using the proposed passing places.

Applicant's Response: "*Given baseline traffic flows on Kent Street are generally very low it is considered unlikely that a vehicle would turn into Kent Street in the time taken for a construction heavy goods vehicle (HGV) to reach Kent Street from the construction compound.*"

This does not explain what will happen if they DO, instead it is more based on hopeful optimism and wishful thinking. Particularly as, from our tractor photos at deadline 4 (Appendix 2 of rep4-105), you can see that some of the public vehicles are very wide and may come out of fields or properties along the lane, whilst a construction HGV is on the lane.

Rampion go on to say: *"The Applicant can also confirm that the proposed passing bays are of adequate width to allow two HGVs to pass each other, noting this should not occur with the controls set-out in the proposed traffic management strategy. The swept path analysis of this is shown on Drawing 62280651-WSP-XXXX-DR-TP-0100-019 as part of Construction Accesses A-26, A-28, A-61 and A-64 Traffic Management Strategies included within Appendix D of the Outline Construction Traffic Management Plan [REP3-029] updated at Deadline 4*."

Unfortunately, like the swept path diagrams for A61 and A64, the diagrams for the passing places are wholly inadequate (see analysis in Construction: Passing Places above) and do not provide evidence that Rampion vehicles could pass each other. It does not answer the question about the size of vehicles that could pass each other at all.

The Applicant doesn't explain at all how, if a construction vehicle is coming down Kent Street, it can *get into* A61 or A64 if another construction vehicles is waiting to get out. There is no space in the access points for this.

Banksmen:

From REP4-072, Applicant's post hearing submission:

The Applicant noted that the banksman would also assist equestrian and pedestrian users by providing a warning. Horses could be held at a similar distance to a car, but the Applicant would

provide further detail of how this would work. This has been provided at Deadline 4 in response to Action Point 42 in the Applicant's Response to Action Points Arising from ISH2 and CAH1 (Document Reference 8.70). (See Horses, cyclists and Pedestrians below for a discussion of AP42)

3.4.12 from the CTMP would suggest that banksmen will control the construction traffic and the public on Kent Street, but *not at the Kent Street A272 junction*. Unless there is a banksman permanently sited at the A272 /Kent Street junction, how will they stop the public, including equestrians and farm vehicles, which cannot easily turn round, from going down Kent Street should an HGV be coming up it? How will they manage the traffic and get them to stop on the A272 whilst a construction vehicle comes out of Kent Street? Stopping, apparently for no clear reason on the A272 is a terrifying experience, and slowing down to turn has been the cause of many accidents in this location as approaching vehicles run into the slowing vehicle in front. **Surely this is one of the reasons why traffic lights would be a far better option?**

Bolney PC (REP4-102) raise concerns, from their knowledge of how the road works, about the negative impact of the banksmen on the A272 and side roads: *"The Parish Council is concerned that proposed strategy may result in congestion on the A272, particularly with banksmen interrupting traffic on the A272 to allow HGV traffic in and out of Kent Street…"*

Horses, cyclists and Pedestrians:

From the Principles of Management of Conflicts with Pedestrians, Cyclists and Equestrians; (**although we note this is not actually specifically talking about Kent Street):**

8.4.6-9: *"Measures included within the Outline Public Rights of Way Management Plan [REP3-033] such as requirements for signage, the 5mph speed limit on routes shared with PRoW and the need for construction traffic to give-way to PRoW users where it is safe to do so.* "This misses the point that Kent Street itself **IS** effectively a PRoW. The 5mph speed limit is unrealistic, in any case they are proposing a 30mph speed limit. Also, how many vehicles will come from delivery companies outside the construction company and therefore would be highly unlikely to stick to 5mph, or know how to manage equestrian encounters?

8.4.7 "In all cases where construction traffic uses single track roads priority must be given to pedestrians, cyclists or equestrians by stopping where it is safe to do so and allowing users to pass." Yet in other sections of the CTMP it is clear that the intention is for other road users to give way to Rampion vehicles, not the other way around.

Discussion with current users of the road tells us that even now, with just ordinary cars, a cyclist cannot safely pass a car. The cars have to pull off the road as far as possible if a cyclist comes along. There is no convincing evidence from Rampion that these huge vehicles will be able to do this. Pulling off and waiting is especially important when horses are on the road (see below).

*8.4.9 "This guidance will be adhered to during the construction period **as far as is practicable**. For example, construction traffic will be required to give priority to equestrian users **where it is safe to do,** and should turn off engines until horses are at least 20m past*." This also conflicts with horses and pedestrians waiting in passing places, as in Para 3.4.8 of the Kent Street CTMP "*Provision of these passing bays along Kent Street will facilitate the passing of cars and, LGVs and HGVs during the construction phase whilst also providing for emergency vehicles or other unforeseen*

circumstances. Whilst ***construction HGVs should not need to make use of these passing places…"*** Again, apparently contradictory.

One of key things the BHS document says is that "A route should be at least four metres wide to ensure that users can pass each other with ease without brushing against adjacent fences, walls or hedges." Kent Street is just 3m wide and in summer the vegetation is high on either side of the road. We have conducted a survey of equestrian users of the lane who tell us that if a horse has to wait for several minutes, it is likely to become increasingly anxious. Seeing a huge vehicle approaching in a narrow lane, which it is filling, or trying to go past such a vehicle, may make it feel penned in and increase the anxiety, making it more likely the horse will rear or run away. There are ditches, many quite hidden, all along the edges of the lane into which a startled horse might fall. If the horse has already started down Kent Street before being asked to wait, this is potentially a very serious safety issue. Horses are not at all used to vehicles of this size, even stationary ones. We all know from the recent events in London, and now repeated again this week, that even the most highly trained horse might not be able to be reassured sufficiently to prevent disaster. Yet paragraph 3.4.15 states that "*Prior to HGV arrival along Kent Street, banksmen will also inform pedestrians, cyclists and equestrians of these incoming vehicles as part of their control of general traffic. This will allow users to wait south of the construction access or move off the carriageway where it is safe to do so (using existing informal passing places);".* These informal passing places are small, the horses may become frightened by the approach of the huge vehicles, and they are boggy and unsafe for at least six months of the year.

One of the equestrian users of the lane tells us that "*Horses are a `flight' animal and the idea of them facing HGVs, patiently waiting at A61or A64, or to cross the A272, in heavy traffic, whilst banksmen decide when they can move, is preposterous.*

The chances of one bolting on to the A272, seriously injuring themselves, their riders, and not to mention causing a serious road accident, are very real."

There is nowhere else for horses to go; there are three equestrian properties down Westridge lane, at least 12 households on Kent Street are equestrian and many others on Wineham Lane use Kent Street. There is a walking circuit from Picts Lane to the north, down Kent Street and through Buckhatch Lane and Moatfield Lane, essential to the many local equestrians in the winter months when the fields are too boggy and slippery. How will horses arriving from Picts Lane be managed? They cannot be held at the entrance to Kent Street on the A272; it is not safe.
The major alterations which would be needed will totally alter the character of the lane; so unnecessary as Wineham Lane is already wide enough.

AP42 Applicant to confirm how the safe passage of pedestrians, cyclists and horse riders along Kent Street would be safely managed.

Applicant's Response:

•" Prior to HGV arrival along Kent Street, banksmen will inform pedestrians, cyclists and equestrians of these incoming vehicles as part of their control of general traffic. This will allow users to wait south of the construction access or move off the carriageway where it is safe to do so (using existing informal passing places)."

As explained above, horses will become anxious if made to wait like this, especially when faced with the advancing enormous vehicle apparently blocking their way. And what happens if they are *already on this part of the lane?*

•" Construction HGVs will not be released from the compound whilst equestrians are using Kent Street north of access A-61 or A-64. This will allow adequate time for the route to be cleared before HGVs travel southbound along Kent Street.

• Exiting HGVs will be held on-site if equestrians are passing either access on Kent Street and until the route is clear for exit. HGV drivers will be required to turn engines off until equestrians are at least 20m past the construction access.

• In the unlikely event that construction traffic meets equestrians on Kent Street, ***drivers will be required to wait in passing bays*** *with engines off until the equestrian user is at least 20m away. Construction traffic would also be required to give-way to pedestrians and cyclists but without the need to turn engines off."*

How do they know it will be unlikely without a proper survey of NMUs?

•" Highway verges on Kent Street will be managed for the duration of the construction period to ensure forward visibility between passing places and ***allow verges to be used by pedestrians, cyclists and equestrian users if necessary."***

This contradicts the statement in the previous paragraph *'drivers will be required to wait in passing bays'.* Also, what exactly does 'managed' mean? These verges are boggy and unsafe during at least 6 months of the year. Does this mean they will put hard core down on the entire length of the verge, effectively widening the entire length of the road?

• "The same strategy will be adopted for HGVs exiting accesses A-61 and A-64."

Their response is nonsensical without knowing what the current usage by NMUs is- a proper survey must be carried out.

WSCC comment: "*From ISH 2 on the 16 May 2024, a number of concerns were raised by local residents concerning the management of HGVs and Non-Motorised Road Users (NMUs) primarily on Kent Street. In recognising these concerns, it is apparent that NMUs may be present on Kent Street albeit these are* ***expected to be low levels given the local context****."* We disagree; Kent Street is essentially a PRoW/bridleway *with traffic.* Equestrian users of the road estimate at least 15 horses or groups of horses will be using the lane each day, and it is a favourite route for cyclists and dog-walkers, some professional.

3.Ecology:

Hedgerow and Vegetation removal and retention plan:

This remains chaotic, ill thought out and contradictory despite being a major issue at the ISH 2.

AP33: to provide a single consolidated document for vegetation removal and retention

The Applicant's Response is that they will provide it at deadline 5. This is not good enough given the many and significant inconsistencies which remain. The conflicting issues are not always obvious, being in so many different documents. Deadline 5 is far too late to allow meaningful discussion or correction, or to discuss baseline loss to assess damage, BNG etc. Some inconsistencies are discussed below:

- **REP4-003** Tree Preservation Order and Hedgerow Plan -pp33-36 (sheets 30-33). It is apparent from this how terrible the devastation will be from Cratemans to Oakendene. **All** the hedges on Kent Street are potentially being removed and **yet the reality is worse still as the huge turning arc for the low loaders has still not been included. Nor the visibility splay from Kent Street onto the A272. Neither are they yet shown in the CoCP,** REP4-044 fig 7.2.1 k. And in REP4-048, Landscape and ecology management plan (tracked), the indicative landscape phasing plan is still showing the massive turning arc as for replanting in the first year.

- REP4-038 Arboricultural Impact Assessment:

Annex 1: Arboricultural Constraints Plan - Inset 47 of 47. Why are the trees on Kent Street all just lumped as a group? There are some significant hedgerow trees eg at the entrance to the proposed battery storage farm opposite the lane to Westridge.

Annex 2 47 of 47; this is still not showing the turning arc loss on the Kent Street /A272 junction

46 of 47; A62 access; this cuts across the access to the Oakendene Industrial Estate. The hedge retention on this plan does not match the potential loss of H612 shown on sheet 33 in REP4-003 above, or REP4-044 fig 7.2.1 k below.: unlike the other two, most of it appears to be retained in REP4-038

43 of 47; this is still showing hedges apparently retained where the cable route/haul road passes, however, even so, it makes clear the true extent of the terrible tree loss at Cratemans.

From 'The Applicant's Post Hearing Submission (REP4-072), item 4b Tree and hedgerow loss calculations and the planned update to the Arboricultural Impact Assessment', the Applicant confirmed that for Deadline 4, "*the Arboricultural Impact Assessment would be consistent with the Vegetation Retention Plan in respect of the location, length and area of vegetation being removed…".* It is clear from the above that this is not so, nor is there consistency with other documents.

And see also Cratemans below for further anomalies.

From REP4-086, para 3.18 it is clear that WSCC have raised many similar concerns over the vegetation retention plans, and Rampion's persistent failure to address them, and we are grateful to them for their diligence in this.

And where, they wonder, will it end: *"As a general point it is concerning that, for the small number of locations where more detailed access design and construction traffic measures have now been provided, these have resulted in the need for additional vegetation losses and introduction of passing bays (both at specific access points and on the wider highway network), both of which are likely to result in increased impacts upon the landscape character and appearance of the affected locality. It is concerning that this could be the case for numerous other accesses/rural highways at the detailed design stage, that the LVIA has not currently considered, and for which reinstatement proposals remain unclear*."

We agree:

In REP4-072*, "The Applicant summarised the key changes to the updated Vegetation Retention Plans submitted in the updated Outline Code of Construction Practice [REP3-025] as being: 102 hedgerows loss, up from 89 at Application, total tree lines lost has risen from 28 to 33, length of hedgerow temporarily lost has risen from 1,130meters to 1,279 meters (with important hedgerows rising from 42 meters to 34 meters[??] and potentially important hedgerows from 84 meters to 90 meters),* ***permanent losses have increased from 622 meters to 647 meters****. Tree line temporarily lost has increased from 378 meters to 466 meters and the total woodland lost has risen from 0.4h to 0.48h."*

This is an enormous amount of ecological harm and given the multiple inconsistencies between the various documents is likely to rise much further. This additional permanent hedge loss of just 25m seems highly unlikely, even though it appears from REP4-023 paragraph 22..9.157 that **all** of this loss is at Oakendene. We believe this will prove to be even greater still, given the remaining failures to take turning arcs and access point visibility splays into account.

*"The Applicant confirmed that it will respond to the clarifications sought by Cowfold v Rampion in relation to hedgerow losses in writing, but that in relation to the comments made about the vegetation classified as being 'hedgerow with trees', it was described in this way due to the requirements of the Habitat Survey methodology requirements. The explanation for this will be set out in Arboricultural Impact Assessment to be submitted at Deadline 4. The Applicant confirmed that vehicle tracking had been assessed based on the worst-case scenario as and such it had confidence in its calculations of what is being lost****. The Applicant also confirmed that standard vegetation management required on highway land had not been included in its calculations****."*
Why not; this is **not** standard in that it is only required for this project and these hedges would otherwise be left alone. We also are unaware that Rampion have responded to our concerns, as they do not appear to have included any response to CowfoldvRampion's submission in REP4-070.

TE 2.6 Potential Loss of Category A Trees: b); monastery to Cratemans, c); cable route south of Oakendene, d); Oakendene to Wineham Lane

Our response: Part of the answer to these questions is the presence of the haul road which means that even with trenchless crossings, the applicant cannot avoid destroying these features. They therefore appear to have taken the lazy option of driving the cable route through them also. At crucial points where notching is required, why, if Kent Street is wide enough for these vehicles, can the notches not be reduced to just 3m? Oncoming HGVs could wait for other construction vehicles

to pass through on a wider section of the haul road; it doesn't *all* need to be wide enough for two HGVs to pass each other.

It should also be noted that the haul road does not appear to be consistently to the east or west of the cable and yet no explanation is given of how it might cross the cable.

At the other extreme, there appears to be *preservation* of features on these diagrams which cannot possibly be the case, due to the presence of the haul road (See inconsistencies above).

Kent Street landscape and ecology:

Horsham DC (rep4-084)**:** *"The principle of Kent Street being used for construction traffic and HGV's is of significant concern … given the likely impact it will have on the character and visual amenity of Kent Street. This is becoming more apparent and significant the more detailed design emerges."*

And: "*The vegetation removal necessary to enable the delivery to the now proposed passaging places within Kent Street have not been considered within the vegetation removal plans and effects on the character and visual amenity on Kent Street." "Please note that any vegetation loss identified within this document should also be reflected and updated within the BNG matrix and calculations."*

3.2.8 The visibility splay will be 120m in each direction at the Kent Street /A272 junction, radically altering the character of the lane and the ability to screen the A272 or Kent Street from the substation.

In addition, they do not answer the question posed at the hearing about whether they can now be sure the substation can be adequately screened, nor is it addressed in the viewpoint analysis. In the Outline CoCP, figure 7.2.6m, most of the hedges along the western side of Kent Street are now shown as 'affected' (H505), and in 7.2.1k as 'cleared to 20m', whereas in earlier Outline CoCP 7.2.1k (eg PEPD-034) H505, and indeed the hedge on the opposite side of Kent Street at A61, were shown as 'retained'. This loss will have a dramatic impact on wildlife connectivity and habitats, calculated hedgerow loss and the ability to screen the substation. A large section of hedge they want to remove in Kent Street is largely made up of oak trees; it can never be reinstated in anything like its former condition.

The impact on the verges, in creating these enormous passing places, the turning arc and the extensive hedge removal for visibility splays, (2x43m for each access point and 2x 120 m for A272) and the visual impact on the whole lane therefore, will be terrible.

WSCC would appear to agree. From REP4-086, section 3.7:

•" 3.3.6 – As previously noted, WSCC are not convinced that the photomontages of the buildings show the worst-case scenario, for example, lightening masts are excluded and the potential change in ground levels not accounted for.

• Regarding the updated Oakendene Substation Indicative Landscape Plan, the additional planting/updated planting provision is welcomed (e.g. at the access and to the south west corner). However, it is somewhat concerning that the native woodland planting belt along the east of the site (adjacent to Kent Street) seems to be narrower, which could potentially reduce its screening effect. Further along this boundary, the plan notes 'Retained and protected tree cover along Kent Street Lane', however, this seemingly conflicts with the latest VRPs in the OCoCP, which show this as

a hedgerow 'cleared to 20m' – this is of concern given the screening effect of the mature existing boundary."

And: "The Traffic Management Strategy for Kent Street provides proposed details of four passing places along Kent Street, the widening of western junction with A272, and visibility splay requirements for the junction with A272. The impacts of which to trees, woodlands and hedgerows situated within and outside of the highway has not clearly been demonstrated with the current ES documentation. This is anticipated to result in additional loss or clearance than currently identified in order to carry out construction suitable for the expected loading, resulting in a notable visual change to Kent Street and potentially it's rural character."

So, apart from Rampion, we all agree that Kent Street's character will be utterly changed. We remind the reader that none of this would be necessary if the substation were to be sited at the already widened and reinforced Wineham Lane. They can no longer claim that the substation can be adequately hidden:

AP44 The Applicant to confirm that once hedging and trees have been removed for the widening of Kent Street at its junction with the A272 and construction of the access A63 (the proposed substation site) there would be adequate screening in the short to medium term of the proposed substation.

Applicant's Response: "*The Applicant has had further discussions with West Sussex County Council…..This has included West Sussex County Council requesting* ***further extension of the kerb line****. The Applicant will continue engagement with West Sussex County Council to define this extent, seeking to avoid this as far as possible, and then amend the associated vegetation loss across all related documentation prior to the close of Examination.*

The Applicant notes however that screening of the onshore substation works at this location will continue through retention of adjacent trees and hedges on the A272 (up to where the site access is required) and along Kent Street, plus the inclusion of a close-boarded fence with advance planting during construction. At the end of construction, ***the advance planting will have matured*** *and this will be reinforced through additional native woodland planting in the north-east of the site as shown in the Design and Access Statement [REP3-013] Design Principle LV9 and the Indicative Landscape Plan in Appendix D of that document. The widened area of Kent Street will also be reinstated."*

We totally dispute the Applicant's response that the substation can now be adequately screened from Kent Street or the A272. It would seem from the above that there will in fact be **even more** removal of vegetation than at their latest submission, due to further extension of the kerb line. There will in fact be very little 'retention of trees and hedges along the A272' as the visibility splays for Kent Street and A63 are almost continuous. In the short to medium term, (and in our view, considerably longer) the new planting will be still at such a low height as to achieve little in the way of screening, especially as they **cannot comply** with the design plan to replant in the first year as the Kent Street splay and turning arc will prevent this.

In addition, it seems that a major part of the screening they propose is with the highly unsuitable '*inclusion of a close-boarded fence'* as shown in some of the viewpoint photos. It would appear that they seem to think that screening the substation with something equally hideous is an appropriate way to deal with the situation. Rather, it adds to the industrialisation of the landscape. Not only is it visually appalling, but it cuts off wildlife paths and routes in and around Oakendene.

3.4.19 "*Visibility splay assessments for the proposed Accesses A-61 with Kent Street and A-64 have shown that 2.4m by 43m is achievable in the north and south directions, through management of vegetation on highway verges. This corresponds with the required visibility for the 30mph recorded 85th percentile speeds recorded as part of the Ensco CTMP traffic surveys and based on Manual for Streets guidance (Department for Transport 2010).*"

This does not tell us how much hedging and trees actually need to be removed. REP3-054 previously told us that an extra 10 and 20 m hedge needed to be removed. **We assume therefore that 43 metres of vegetation in each direction actually means hedge.**

AP45 The Applicant to consider haul roads (using temporary bridging where necessary) from access A63 to access the sections of the proposed cable corridor accessed from A64 and A61.

Our response: The Applicant's 'concept study' is simply a series of excuses to justify reasons for not incurring the additional expenses involved. However, they do not appear to offset the increasing costs of altering Kent Street and reinstating it etc in the calculations they make. We remain opposed to the additional destruction of Oakendene in order to avoid Kent Street. However, since voicing these objections, it has become clear just how appalling the Rampion proposals for Kent Street are becoming, ecologically and visually, as well as the 'don't care' attitude to the daily lives of residents. Therefore, we are of the view that if consent *is* granted, a **properly sequenced** use of Oakendene to avoid Kent Street may be less damaging than the proposal to use Kent Street:

- The only reason for routing the southern haul road to the east or west of the substation site would appear to be the financial implications of doing the work sequentially. If the cable route was completed first and then the substation, there would be no need for a haul road to the east or west, or therefore for most of this additional destruction. This would also avoid most of the further fragmentation and loss of the dormouse and bat habitats
- Why are turning circles required? If they are required, why are they not needed in the current scheme which uses Kent Street to access A61 and A64?
- They mention additional loss of trees and hedges as a reason not to do this, but they do not offset this against the huge loss of trees, hedge and scrub which are required on Kent Street to create the access points and passing places.
- The '*proposed mitigation measures around the substation footprint'* would not be impacted if the cable was laid before the substation work began as the route could be through the middle of the substation site.
- *'The footprint of the bridge overall is assumed to be larger than just the 6m haul road to account for these factors.'* How does the *width* of the bridge affect the free flow of water beneath it. The length and height must be more relevant to this than the width.
- Surely, in any case the bridge only needs to be wide enough to take one vehicle; it doesn't even need to take two at once and therefore doesn't need to be even 6m wide. Otherwise, it would also have to be engineered to take the weight of *two* HGVs, not one.
- In fact, if they can be proposing to use Kent Street, which is only 3m wide at most, why could the haul road and bridge not be reduced in size from 6m, thus reducing the extent of the habitat disruption when crossing the tributary?
- A trenchless crossing could still be used for the cable itself, to minimise habitat loss.
- It is curious that the Applicant is suddenly so concerned about the fragmentation of dormouse and bat habitation, when this concern did not seem to affect their choice of

substation site in the first place, even though the loss of so much hedge and tree is so significant regarding this.

For A64

- '*The crossing point would be located at the northern end of the site to reduce interface with the onshore substation construction.' The* crossing point is *already* at the northern end of the substation site. There would be no reason to change it if the cable were laid before the substation work took place, or to lose an additional 6m of hedge.
- The route across Kent Street would be perpendicular to it. Compare any hedge and tree loss to the 43m of hedge (at the last count, and in each direction) Rampion appear to need to allow the HGVs to turn in and out of A64 from Kent Street. And, if they can manage to use 3m wide Kent Street now, surely the gap in the hedge could be reduced still further from 6m?
- The Applicant says that ditches will have to be crossed to put the haul road across Kent Street from the substation site to the high voltage cable route, *'Such a crossing of Kent Street would need to allow for culverts for the ditch running north – south.'* But Rampion already need to cross far more ditches in the current plan in order to access A61 and A64 and to create the four passing places they propose.
- A trenchless crossing under the lane for the cable should still be used, to minimise loss and disruption.
- This is the first mention we see of the diversion of the UKPN 132kv cable. What details do Rampion provide as to what this will entail and the disruption to the A272 and Kent Street to achieve this, not to mention the fibre optic control cable which also runs under the A272 and Kent Street along a different route. Why does the work necessary to make Kent Street usable for the current plan not '*conflict with other works and their timing'* in the same way? Again, an unwillingness to carry out work sequentially, and therefore incurring greater costs, seems to be at the heart of this.
- In the same way, the '*space set aside for drainage',* and the planting, could simply be created *after* the cable was laid.

We do not agree that '*the additional cost* (of just £1m) *makes the use of A-63 a significant risk to delivery of the Proposed Development'*. Nor that *'the reduction in effectiveness of secured ecological and landscape mitigation, weigh heavily against a change to the application proposals in this location.'* If the reduction in destruction of the vegetation on Kent Street is taken into account, and offset against this damage, and the works were to be carried out sequentially, we do not believe the difference would be very great, although in both situations the devastation remains appalling. Perhaps if the costs really are so prohibitive, Rampion should reconsider the Wineham Lane options.

The sequencing of this work will be delayed and complicated by the fact that there are various commitments regarding the Cowfold Stream area (see Flooding: Flood Plain section below), but this is another consequence of how poorly thought out their proposals are.

The Applicant leapt into this option without properly thinking it through or costing it through and now the environment and the public are being asked to pay the price. As a result of grabbing at the seemingly easier option without proper consultation, all these additional engineering costs cannot have been taken into account when considering the alternatives. We ask for the full documents when they weighed up the alternatives to make their decision, to be available for public scrutiny.

It is not acceptable, when public money is involved, for them to simply pick the cheapest, easiest option for them, and then hold the nation to ransom by saying they won't be able to go ahead if they are not allowed to get away with it.

AP47 The Applicant to provide a note on how the proposed works at accesses A64 and A61 would impact the landscape setting.

Our response: The applicant's response is dismissive. The cumulative impact of all this hedge and tree loss will be immense, visually and ecologically. Part of these 'hedges' form the location of several nightingale territories (see submissions by JHC). The 'loss of a single oak' is dismissed as irrelevant and unimportant. In fact, we believe that rather than being truly just a hedge, the boundaries on either site of the road are, more correctly, a series of mature trees, mainly oaks, and deep scrub, all of which form an important wildlife corridor and habitat. There are several large oaks at risk. How can it be credible that the work at A61 will not impact the landscape either? None of this loss can have been factored in to the additional vegetation loss as its extent is not yet fully understood. This is the same as the comments made by the SDNPA that the most basic part of assessing BNG, which is to accurately assess the true loss, has not yet, at this late stage, been properly carried out.

Regarding the extensive hedgerow loss in Kent Street raised by CowfoldvRampion at the ISH2, the Applicant responds in the Applicant's post hearing submission (REP4-072, 7a) Kent Street Traffic Management Strategy "*The Applicant noted in response to comments made by Cowfold v Rampion that the loss of hedgerow would affect the character of Kent Street, that Access A59 is an operational access and that there would be no hedgerow loss as it is not a construction access*." This is to miss several points:

- firstly, if the access A59 is where they said it would be, **there is no gap in the hedge**, and so whether for operation or construction*, a section of hedge will have to be removed.* If it is in fact elsewhere, the Applicant needs to make clear its exact location.
- Secondly, the CowfoldvRampion comment was about the extensive hedge removal *as a whole* along Kent Street, not just access A59; the Applicant makes no attempt to answer this.

Cratemans:

From the Applicant's Post Hearing Submission REP4-072 section 4c*: "The Applicant confirmed that it needed to clear vegetation on the land near to Crateman's Farm (as shown in figure 7.2.3k of the Scrub Retention Plan) for a trenchless crossing which is located nearby and the additional area will be required for duct stringing activities. [The Applicant would like to correct this statement made in the ISH2.*

The Applicant stated that vegetation clearing at Crateman's Farm was likely due to the need for duct stringing activities in this area, this is not correct. Duct stringing would be undertaken from the northeastern side of the stream crossing. [Presumably with the loss therefore of a different area of scrub or hedge?]

With relation to the Scrub feature HS558 as shown in Figure 7.2.6.m in Appendix B of the Outline Code of Construction Practice [REP3-025], the Applicant requires the ability to create a clearing of up to 30m across the entire feature to account for the worst-case environmental outcome due to the

following construction related reasons: • Detailed trenchless crossing design and associated siting of HDD compound / TC26 is yet to be determined and subject to ground investigation. The cable route leading up to the TC will need to align to this, as a result impacting the scrub feature. Note that cable spacing for trenchless crossing will be wider than in open cut areas, as a result taking also a wider area in the approach to trenchless crossings. The area near this trenchless crossing is already spatially constrained. • The existing overhead electricity line would need to be considered in construction planning, and either a required temporary diversion or exclusion zones around the OHL to be implemented. "

This response would appear to be essentially: 'we don't recognise it as significant and are going to destroy it anyway'. Yet this is one of the most ecologically sensitive areas of Cratemans Farm. (See opening paragraphs of REP4-112.

TE 2.32 Preliminary Ecological Appraisal at Cratemans Farm:

Our response: With respect to the mitigation hierarchy at both Cratemans and the Green Lane, the Applicant has failed at the first hurdle, which is to avoid if possible. It *is* possible, as there is a clear alternative, which, without even considering the impacts on these sites, was apparently only 'marginally' less preferable. The applicant has not followed the mitigation hierarchy; on the contrary, it has 'sought first to ignore' and downplay. They have leapt straight to the final option in the hierarchy, which is to plant a few trees and hedges *elsewhere* to compensate for the loss.

Inconsistencies of the Cratemans figures from the Outline CoCP, REP4-044,

- figure 7.2.2h-how can W689 and W5863 woodland be retained at Cratemans if the haul road goes through it?
- But in 7.2.3k, HS5798, which appears to be in the same position as W5863, is to be destroyed.
- 7.2.3j still shows scrub retention despite the presence of the haul road.
- 7.2.6.m and n: are both similarly conflicting (combined plans) eg how can HS1405 be retained if the cable route and haul road go through it?
- Grassland retention plans-Cratemans does not even feature (but we draw your attention to the Arborweald report below which details the high-quality meadowland present on this site).

Cratemans land and the area around the Cowfold Stream are on a zone 3 flood plain. Commitment C117 states that there will be **no work on a floodplain level 2 or 3 between October and February.**

This conflicts with C21 which states that "*Where vegetation removal is necessary, it will be **scheduled over winter to avoid the bird breeding season***." We have highlighted this on several occasions but it does not seem to have been addressed by the Applicant. In addition, there is an alarming exclusion in C21 which goes on to say that they *can do it where not possible to work over winter*. This means that for Cratemans, an area dense in scrub, hedges and trees, the nightingale population will be destroyed.

It is also at odds with C203, which commits that *"Preconstruction checks for ground nesting birds will take place in advance of construction works between late **February and August.** Where breeding birds are located species specific exclusion zones will be implemented within which no works can take place*". We are unconvinced that Rampion will actually find the many nests in the

dense vegetation around Cratemans and so again, terrible destruction of nesting species will occur, and of reptiles, dormouse and other species.

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REP4-112 and the Arborweald report:

This categorically endorses that the fields labelled as A and B are 'unimproved lowland meadows' and as such should qualify as BAP Priority Habitat. Phase 1 habitat studies in APP-063 (Figure 22.3.1k) have labelled these fields 'poor semi improved' and the adjacent field 'Improved'. The field marked as 'improved' has been treated the same as fields A and B by the landowner and shares most of the same meadow plants. Underplaying the quality of these fields is a serious error especially as they are so badly impacted by the construction process and they support so much biodiversity.

This further evidence undermines the quality of other grassland classification surveys submitted by the Applicant for this area, if not potentially for the whole onshore cable route.
It is also a theme we see repeated in submissions from other affected Parties such as the SDNPA, Sweethill Farm and College Wood Farm.

C291 and 292 contain too many 'where possibles' and discuss the loss of key habitats such as scrub, and *semi-improved* grassland; no mention is made of *unimproved* grassland. Presumably because the applicant has stated it will avoid such sites. In fact, it has simply appeared to have done so by downplaying their true quality and therefore pretending they don't exist.

It is not only the grassland classifications by Rampion which are undermined by the report eg 3.20 *"As such, all hedgerows on site are classified as 'important' under the Hedgerow Regulations Act 1997."* Contrast this with Table 22-25 in REP4-023 where *none* of the hedgerows at Cratemans are classified as important.

The Arborweald conclusion is: '*It is the author's professional opinion that the fields surveyed at Cratemans Farm comprise unimproved grassland bounded by species rich hedgerows that are 'important' as per the Hedgerow Regulations Act 1997. Both fields are identified as 'unimproved' grassland under the BAP, DEFRA and Natural England framework for assessing grasslands.'*

5.1 The proposed development site is currently considered to have high ecological value within a local context as ***it comprises locally scarce habitats supporting locally abundant species typical of designated sites in the wider landscape."*** Its high degree of connectivity is noted and the wide range of species it supports.'

How can its loss and the loss of the important hedges which surround it, be justified in this nature-depleted nation? He compares it favourably to a local SSSI site. These findings throw into question not just Rampion's grassland and hedgerow surveys but *all* their ecology reports.

It is quite apparent from the Written Questions that there has been a lot of inconsistency, lack of thought and serious downplaying of the baseline in the Cratemans /Cowfold Stream/ Oakendene area.

The Applicant was told about these precious habitats in the earliest stages of the consultation and was presented with detailed evidence by Janine Creaye to support this. They chose to ignore it, and

worse, they have downplayed the true nature of these habitats in their surveys and reports in order to justify their choice. As they were warned would be the case by Ms Creaye, there is so much habitat destruction in this small area, which clearly was ignored when the decision to choose the substation site was made. **They did not factor in the destruction of the green lane and Cratemans in their consideration of the alternative substation sites, or their 'marginal preference' for Oakendene.**

The Green Lane:

In REP4-072 section 4c *"The Applicant confirmed it would provide a response to the ExA's question about the importance given to the Green Lane feature W110 on figure 7.2.6 of the Outline Code of Construction Practice [REP3-025] and the justification for its removal at Deadline 4. The Applicant's response to* ***Action Point 29*** *is provided at in the Applicant's Response to Action Points Arising from ISH2 and CAH1 (Document Reference 8.70)."*

AP29: Applicant to consider the significance given to the hedgerow / treeline known locally as the 'green lane' labelled as (W110) in the Outline Code of Construction Practice in Appendix B Vegetation Retention Plans and Pond Retention Plans Figure 7.2.6m [REP3- 025] and justification for its removal

Applicant's Response:

"The Applicant notes that the feature W110 would not be removed in its entirety but is shown on Figure 7.2.1k in Appendix B of the Outline Code of Construction Practice [REP3-025] (updated at Deadline 4) as being subject to the loss of up to 14m (one 6m notch and four 2m notches). This follows the embedded environmental measures employed on the project of notching hedgerows and treelines. Appendix 22.16: Arboricultural Impact Assessment, Volume 4 of the Environmental Statement [APP-194] (updated at Deadline 4) shows this as two features (G29 and G35). G29 shows the understorey that as a grown-out hedgerow and G35 are the hedgerows standard trees (all of which are Category A status). These trees are not veteran or ancient and are akin to others that are assumed to be lost in the realistic worst-case scenario.

During detailed design loss of the standard trees would seek to be avoided or minimised as far as practicable by following the mitigation hierarchy (as per commitment C-292) by micro siting the cable trenches and haul road through existing gaps. This is subject to detailed design and will be confirmed in the stage specific Codes of Construction Practice to be provided pursuant to Requirement 22 of the Draft Development Consent Order [REP3-003] (updated at Deadline 4). In response to this Action Point, the Applicant has also considered application of a trenchless crossing in this area. It is noted that this would not avoid all loss as a haul road of 6m would still be required for continued access along the cable corridor. An additional trenchless crossing would be expected to result in additional traffic movements for the set up and required plant during the works using Access A-61 from Kent Street and addition of noise during the 24-hour working required which would require further mitigation. In addition, there would be additional temporary land take for the trenchless crossing beyond that identified with the landowner to date. While minor benefits would be apparent from an ecological and landscape and visual perspective, when considered alongside the additional construction costs of approximately £600,000 this is not considered proportionate given the significance of the features described above and that some loss would still occur even with

the trenchless crossing. For these reasons, no change is proposed to the design and the embedded environmental mitigation measure of a reduced maximum 14m loss will be provided. "

Our Response: The applicant's response is to totally downgrade the ecological importance of the green lane. They haven't assessed it properly despite the high-quality category A trees. Whilst individual trees may not be veteran (though we do dispute this) they are undoubtedly important in terms of wildlife connectivity, and it was clear to the ExA even after a few moments' viewing on the ASI that it was an important, ancient feature. Rampion have not 'considered its significance' but have dismissed the veteran qualities of trees and hedge as outlined in Ms Creaye's previous submissions.

They tell us that "*During detailed design loss of the standard trees would seek to be avoided or minimised as far as practicable by following the mitigation hierarchy".* The first part of the mitigation hierarchy is to seek first to avoid. There is no evidence that they took its loss or that of Cratemans into account when choosing the substation site. We ask for authoritative statements of what is actually likely to be lost to be provided.

To consider the trees in isolation is to miss the point of a wildlife corridor, the historic value of the bank and ditch, and the continuum of the canopy. The green lane is about so much more than simply the trees. They just care about their engineering constraints and money. How they get the haul road through is another nightmare to be resolved ecologically speaking. They should not be coming this way.... they got it so wrong.

TE 2.7 Vegetation Line W110 / G35 Known Locally as the 'Green Lane'

Our Response: The haul road is necessary to reach the trenchless crossing at the Cowfold Stream, and to lay the cable. Even 6m of loss of the green lane would be devastating to wild life connectivity and this ancient feature (see above). There are no other roads in this area, as we have pointed out and as Janine Creaye has done from the outset, yet they have chosen to ignore her.

For a detailed assessment of the green lane, please see Janine Creaye's deadline 5 submission.

Oakendene Lake:

The outline CoCP, REP4-044 figure 7.2.5e shows a small 'pond' (pond 206) as unaffected. This may be true in the sense that it will remain, but it cannot be true in the sense of its habitat and wildlife importance, given its proximity to the substation construction noise, vibration and lighting, or the permanent impacts of the substation itself. Immediately to the west of it is the large Oakendene lake into which it flows, both being on the tributary of the Cowfold Stream which runs along the southern border of the substation site.

We would like to please remind the ExA that the impact on the lake at Oakendene and the wildlife it supports seems to have been largely forgotten in the discussions about biodiversity loss and biodiversity net gain. Just because it is not itself directly within the DCO boundary does **not** mean it will be unaffected. It is directly adjacent to the substation, which will make a permanent noise and vibration. For the duration of the construction there will be noise, vibration and lighting fairly

continuously, hundreds of metres of hedging and mature trees will be lost, the scrub habitats around will be lost. All of this will take decades to replace in equivalent form, if at all, all affecting the connectivity around the lake and the insects and smaller creatures which support the wildlife on the lake.

Habitat Reinstatement:

REP4-044 para 5.6.35, under ecology and nature conservation: "*Temporarily lost (hedgerows / tree lines temporarily lost during construction e.g. due to access, temporary construction compound establishment, angle of crossing of cable corridor and reinstated following construction);".* It is misleading to describe the many mature hedges and trees which will be destroyed along the cable route as 'temporarily lost'. Whilst replanting may occur, it will be many tears if not decades before these habitats can be restored to what they once were if at all.

Reptiles and amphibians: 5.6.74 "*Reptiles and amphibians may occur in suitable habitats within the proposed DCO Order Limits. In all locations excluding the onshore substation at Oakendene, the potential effects are restricted to the accidental death or injury of individuals given the relatively small land take in any particular location*", We disagree with this statement; at Cratemans there is good evidence that this is an area particularly rich in reptile species and that the cable route and haul road will do immense and permanent damage to their habitats. Also, it is highly unlikely that a 'clerk of works inspection every morning' will find them; they are elusive creatures.

Breeding birds-REP4-023, para 22.9.188 "*Of most importance to breeding birds will be the loss of more complex habitats including woodland, hedgerows and scrub*." Just about **all** of it is centred on Cratemans and Cowfold Stream and will not be reinstated at that location at all: it is simply not possible to recreate the lost ancient trees and hedges and wildflower meadows in the lifetime of the substation. Indeed, the intention for biodiversity gain is elsewhere, so this area will never recover.

Similarly, the sections on fragmentation, noise and light level are all particularly severe in this location ie Cratemans, Cowfold Stream and Oakendene .eg Increased light levels (resulting in disturbance or displacement) 22.9.199 "*Breeding birds could be disturbed by the use of temporary lighting used to enable construction in hours of darkness. Lighting is only likely to be necessary in places where trenchless crossings are being completed as 24 hour working maybe required*." Again, this area, one of the most biodiverse, is particularly hard hit because of the trenchless crossing under the Stream.

Dormouse habitats:

From REP4-023 paragraphs 22.9.157 to 2.9.160 outlines their plans to preserve dormouse habitats despite the extraordinary loss on this site. They conclude: "*Therefore, overall, there will be an increase in suitable dormouse habitat at the onshore substation site. Although there will be a reduction in quality of available dispersal habitat initially (newly established habitat will take time to provide the right conditions for dormouse), the level of provision and the advanced planting will ensure suitable habitat will be available throughout the construction period. With the provision in the medium to long term providing more and better quality habitat than that which would be lost*."

We disagree with this; the construction work will either destroy or drive out dormouse populations and the habitats described will not reach a similar level of maturity in the lifespan of the substation.

Turtle doves:

Isabelle Tree, speaking on BBC radio 4's Woman's Hour on 10th June, said that the nearby Knepp Estate may soon be the last place in the UK where you will still be able to hear a turtle dove. If this project goes ahead, with the destruction of Cratemans and Kent Street, her grim prediction will be one step closer to reality.

A composer has created a CD called Knepp Dawn. It records the sounds of nature in the rewilding park. He said, it was 'the *very distinctive* sounds of nightingales, cuckoos, turtle doves and skylarks' that compelled him to write the track. We, in and around Oakendene, Kent Street and Cratemans, experience our own Knepp Dawn, with all the same species found at Knepp. You would not permit this destruction on the Knepp estate; why here? Surely rather than BNG by supporting the Horsham rewilding (which is, no doubt, very laudable) surely, it is better to *prevent* the loss in the first place?

4.Viewpoints:

WSCC (REP4-086, para 3.18) raise the issue of ever-increasing destruction of vegetation, and therefore increased visibility of the substation, as well as ecological impact.

In the Viewpoint Analysis REP4-034, Table 1-1 is simply not credible. How can they have actually **downgraded** some of the impacts when so many more trees, scrub and hedgerows are now to be removed? What is the possible justification for this conclusion?

Viewpoint details are taken from REP4-026 and -027 for the following sections:

From public roads:

SA9: Figures 18.14.2-3a-e really underrepresent the true impact, as huge amounts of trees and hedges will be removed but this is not shown in these views. Please observe also how little the much vaunted 'curve in the road' actually screens the substation from view. The close board fencing is highly inappropriate and the appearance from the A272 will be industrial. The photo of year ten is still dreadful, with a big alteration to the character of the approach to rural Cowfold village from the east.

SA1: Many of the trees in the photographs will actually be removed altogether (see REP4-003) both from Kent Street itself and from the southern boundary of the substation site, so again the true impact is not shown. 18.10c already looks industrialised, even without the removal of these trees. Even at 10 years it is clear there is no hiding the giant structures

REP4-034, section 1.3, Table 1-4 still says "*The view will be experienced by road users whose experience of the view is likely to be transient and* ***focused on the activity of driving.*** *Therefore, susceptibility to change is assessed as Medium, and the overall sensitivity is assessed as Medium*."

They continue to ignore the fact that a significant proportion of the road users are non-motorised users. Their statement completely fails to recognise one of the most important uses of Kent Street: as a PRoW and bridleway, even though, being a road, it is not listed as such. However, it has a high amenity value as a route for walkers, runners, cyclists and equestrians. They go there to take in their surroundings, not for a 'transient' view.

Please note also that in fact **equestrians are much higher** than most other road users and their view of the substation will be even less shielded.

Rampion's comments about this also fail to consider the fact that the view impact for Kent Street is not just about the substation, which will be very visible for years to come, but the visual alteration of the lane itself, created by the huge tree, hedge and other vegetation loss because of the visibility splays, passing places and access points on Kent Street.

The document goes on to say: "*All of the other vegetation visible in the view including hedgerow H505 and woodland W738 in the foreground will be retained.".* This is simply not consistent with Outine CoCP, Figure 7.2.6m-see Kent Street landscape and Ecology section above.

At year 10 they say "*The magnitude of change on the view will reduce to Low in the winter months and Negligible in the summer months when all vegetation is in leaf*." We disagree with this due to the extreme loss of vegetation, both on the lane itself and surrounding the substation, which will

not recover to the equivalent of what is there now, in anything like ten years. Even their own viewpoint representations do not support this claim.

SA2: figures 18.11b-e, give a truly horrific picture of how much this view will alter, but yet again, it still doesn't give a true idea, as the trees and scrub to be removed for the turning arc and the hedges to be removed as visibility splays are all left in situ. Once the removal of the substantial trees in the foreground has taken place, the huge expanse of the substation will be clearly visible behind them. There has been no attempt to superimpose the substation image on these pictures, even to the extent that they have done in SA9.

Table 1-4 tells us that "*SA2 has been amended to reflect the new vegetation retention plan*", but it *still* doesn't accurately reflect the reality as again, this doesn't include the turning arc etc.

NB we draw the reader's attention to the sign in the foreground indicating **the 2m width restriction.** Many of Rampion's HGVs are substantially wider than this, underlining the total unsuitability of this whole plan.

From PRoWs:

From **SA 3,7,12 and 13,** currently the only man-made structure which is visible is Oakendene Manor. Beyond that the High Weald AONB rises up. **To the local community, and anyone who has walked these routes, this view is a key feature of the importance of the setting of Oakendene Manor.** The viewpoint photographs are devastating in their alteration of the landscape, but they do not go far enough, in that much of the vegetation still shown in the photographs will be removed for the construction of the substation and haul road. Even after 10 years the impact will be truly terrible. **Many of the pictures do not take the leaf loss effect of winter into account either.**

The impact will be far worse than if it were to be built on the already industrialised Wineham Lane, as can be seen from the viewpoint images around the Bolney substation extension.

SA3 and SA7 are east and west of the ancient Taintfield Wood and the appreciation, not only of Oakendene Manor, but the wood itself, is radically undermined by such a change in its context. People do not go along these PRoWs to get from A to B, but to enjoy the unique surroundings and the natural environment. Even Rampion in REP4-025 admit "*From here the architectural interest of Oakendene Manor can be appreciated within the context of the former parkland,….*".

SA13 is on a continuation of PRoW 1786 from SA3. It runs immediately to the west of the substation and is very close to the south west corner of the site. Given this proximity, REP4-034 Table 1-4's conclusions about the substation impacts on SA13 are frankly laughable: "*The magnitude of change will be Negligible (all seasons).*"

During the construction phase, there will also be the visual impact of the western compound on many of these PRoWs.

We would also like to point out that there is an informal but well used footpath to the south of the western compound, which goes to Cowfold, which will be visually impacted to a considerable degree by this.

SA12 is on PRoW 1787 and to the east of Taintfield wood. They describe it as '*through a gap in the hedge'*, which is currently true (but it is a gap at which, when you come to it, the view makes you stand and stare), but there will be much loss of both this hedge and the vegetation around the

tributary of the Cowfold Stream to the south of the substation, which is not taken into account in the photographs.

SA8 is on high ground and looks down towards the substation area. We do not agree with their assessment of little impact, because the removal of vast tracts of hedges and trees on Kent Street has not been shown on the photographs.

Why are there no assessments of the PRoWs around Cratemans Farm for the assessment of impacts on the PRoWs of the cable corridor? (1781 and 1776/1) They appear to have been scoped out, yet they are affected very significantly by the cable route and haul road through Cratemans Farm

In the Historic environment document, REP4-025, paragraph 25.9.543, Rampion discuss the impact of the view of the Grade II Listed Oakendene Manor (NHLE 1027074) from the PRoWs which include viewpoints we have mentioned above: "*construction activity would be perceptible in long filtered views of the asset from the south in the vicinity of Taintfield Wood, such as when moving along the Public Right of Way (PRoW) (1786) on the hillside to the south from Taintfield Wood (see LVIA VP SA3, Figure 18.12, Volume 3 (Document Reference: 6.3.18)) and through a gap in the hedgerow from the PRoW to the east of Taintfield Wood (1787) (see LVIA VP SA12, Figure 18.78, Volume 3 [APP-103] (updated at deadline 4). Perception of construction activity would become more prominent as the construction phase progressed on the built form of the substation. This would detract from filtered views of the asset in which its architectural interest can be appreciated within its rural parkland setting.*"

We do not agree that the views are heavily filtered: they are stark, and totally alter the perception of the manor house from the ancient woodland area. They are also not at all reflecting of the effect in winter, when there is virtually no screening at all.

From the Manor House:

SA10 and SA11: These photos do not take into account the removal of the hedgerows H511 and H512 and the substantial trees within them, nor the difference in height between the remaining hedges and the 12m substation. Nor do they take into account the effects of leaf loss in winter.

It seems extraordinary that the Viewpoint Analysis can equate the impact of the *substation construction* on SA10 and 11 to the impact on the PRoWs at SB6 and SB3 of just the cable corridor construction. Both are listed as 'major to moderate'. The substation construction is far more prolonged, substantial and closer to SA10 and 11 than the cable laying in Wineham will be to the Wineham receptors.

The ExA are clearly appalled by the new images of the viewpoint views to be asking the question:

HE 2.1 Heritage Assets: Given the Deadline 4 submission of viewpoints SA9 to SA13 [REP4-027] and the supporting viewpoint directory [REP4-036] for Work No.16, provide definitive comment on whether harm to Oakendene Manor is likely to be less than substantial or otherwise.

Our response: The following mean that there cannot be anything other than substantial harm to the character and status of the building as a heritage asset:

- The extensive removal of tree and hedge from around Oakendene,
- the brutal impact on views from and views of the manor house,

- the ever-increasing loss of vegetation from Kent Street and the Kent Street/A272 junction,
- the loss of tree and hedge from A63, and
- the terrible visibility of the substation from the PRoWs, where currently the manor house is the only manmade structure visible.

The heritage value is not purely dependent on whether or not the building itself is damaged, but on the context of the setting in which it sits. Even Rampion admit the presence of the onshore substation will have an urbanising effect on the rural setting of Oakendene Manor.

From "Historic England: the setting of heritage assets":

"The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity,.." Therefore, the way we will experience this grade 2 listed building will be affected by noise dust and vibration, both during construction, but also by industrialisation during operation.

"When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation" Rampion make much of the 'urbanisation' created by the industrial estate. We do not agree; it is well hidden and very small scale. Nevertheless, any cumulative effect must be considered. If this goes ahead, there is a significant probability that, to a future buyer, the manor house would be viewed as unappealing, making it unviable to preserve it in its present excellent form.

"Setting is not itself a heritage asset, …Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance" We argue, that in this instance, its setting is highly significant, and that includes its ongoing and historic relationship with the village and community of Cowfold, for whom, because of the beautiful walks around it, its heritage significance if greatly appreciated, and that the degree of industrialisation proposed by Rampion would radically alter both and therefore the substation *is* a cause of substantial harm.

The viewpoint analysis REP-034 para 1.2.6 says "*During operation, these significant effects will reduce to seven viewpoints (SA1, SA3 and additional viewpoints SA9-13) by operational Year 1 and then reduce to three viewpoints (SA1, SA3 and S12) by operational Year 5. Over the longer-term significant effects will be limited to views from two viewpoints (SA3 and SA12) at Year 10, both of which relate to views from PRoW on the elevated land at the edge of Taintfield Wood to the south*." The evidence we have presented does not support this. We provide evidence of a devastating impact on views both from and of the manor house, and believe also that if SA6 been taken from a higher point, the substation would be visible from the AONB also (see REP4-105)

One only has to look at the pictures of the main substation and Rampion 1 in the photographs from SB6 to understand how little screening has actually been successfully achieved there; in the case of the former, even after 60 years.

NB HDC (REP4-084) query whether the Oakendene A63 compound has been reduced to 2.5 ha. Sheet 26 (p149/211) of the Outline CoCP (REP4-044) does NOT show a reduced compound size.

5.Engagement with Affected Parties:

LR 2.1 Efforts to Acquire the Land Required for the Proposed Development by Negotiation. The ExA considers that, based upon the written evidence up to and including Deadline 4, and oral evidence discussed at the Compulsory Acquisition Hearing 1 on Friday 17 May and Tuesday 21 May 2024 [EV6-001], it may not be able to recommend to the Secretary of State that the case for Compulsory Acquisition has been made. This is based upon the apparent lack of meaningful discussions and progress with persons with interests in the land and the lack of advancement of voluntary agreements. The ExA would have expected the Applicant to have been at a much more advanced stage at this point in the Examination. **Provide a summary of all efforts to acquire the land required for the Proposed Development by negotiation since the close of CAH1.**

Our response: A prime example of the failure to meaningfully engage with landowners is the most shocking case involving the owner of Cratemans Farm (REP4-132). It shows very clearly Rampion's contempt for the process, their disinterestedness in securing the welfare of affected parties, their lack of engagement or attention to detail.

He writes;" *In March this year I requested from RWE a definitive plan showing the proposed route through my land at Cratemans Farm. The attached is the plan that they sent. It is blatantly obvious that the "overlay" has been placed in completely the wrong position....This is very concerning in view of the fact that this plan was sent by RWE, the very company that is proposing the construction and certainly does not instil confidence in their ability."*

The plan attached to Rampion's response shows the cable route *in completely the wrong place*. Yet the plan says 'drawn, checked and approved'. It demonstrates the poor quality of work and 'evidence' they submit, and is an unacceptable way to behave towards a man whose home of 65 years, his livelihood and the extraordinary wildlife habitat he has created, is under threat of utter devastation.

A further example of their contempt for the process is shown in his additional submission REP4-140 which sets out evidence that the applicant's submitted habitat survey is misleading in important areas, as it significantly understates the biodiversity and ecological importance of the site. This is confirmed by the Arborweald Report (REP4-112)**.**

In the BoR, 33/10 and 33/16 (which are the substation site and compoundA63) it states that *National Grid Electricity Transmission plc 1-3 Strand London WC2N 5EH (Co. Reg 02366977)) restrictive covenants contained within a Conveyance dated 10 December 1968 registered under title SX3222).* These covenants are now taken over by UKPN, yet they do not seem to feature in the land rights tracker for 33/10 or 33/16, yet UKPN are there under other plots. If there are indeed 'very few points still outstanding' with UKPN, then we should hear about how this is going to impact on landscaping and the A272 and Kent Street without delay. Instead, we strongly suspect Rampion have not engaged with UKPN about this particular underground cable and will seek to present it as an 'unforeseen' issue after consent; it is **not.**

LR 2.2 Progress with Land Rights Negotiations: Provide the following information in relation to obtaining Land Rights for the Proposed Development by agreement (include figures for AP's who have not submitted RRs or WRs): a) Total number of signed agreements required. b) Number of Key Terms issued. c) Number of Key Terms signed. d) Number of agreements completed.

LR 2.3 Requirement for Compulsory Acquisition of Plots

Our response: Regarding LR 2.2.and 2.3, we give the example of Affected party PCM (URN 070). Rampion first contacted him in 2021 and then again in 2024, and that is all. We attach a copy of the 2024 letter (**see appendix 4**). The Land Rights Tracker (REP4-083) shows the following from Rampion:

Page 9: "*The Land Interest was first consulted by the Applicant in July 2021. Land parcel bordering an existing lane and access rights to residential dwelling, affected by use as an operational access route Despite attempts, the Applicant has been unable to make contact with the Land Interest. Heads of Terms were issued in April 2024 and the Applicant is awaiting feedback from the Land Interest on the Heads of Terms."*

Page 24: *"The Land Interest was first consulted by the Applicant in July 2021. The Land Interest owns a small parcel of land within the DCO boundary. The parcel of land borders an existing lane, which is a proposed Rampion 2 operational access route. In addition, the Land Interest has access rights over a lane which leads to their residential property. The lane is proposed to be used as a Rampion 2 operational access. Despite attempts, the Applicant has been unable to make contact with the Land Interest. It is anticipated that Heads of Terms will be issued in due course.* ***The Applicant understands there are no outstanding issues, other than further explanation as to the anticipated use of the operational access.*** *The Applicant will respond directly to the relevant representation."*

The so called 'first consultation' by the Applicant consisted of sending out an equally uninformative letter as the one shown in Appendix 4. The affected party did in fact write a relevant representation but has not engaged with the DCO process further up to now, as he has not felt able to do so. He wrote: "*My concerns are: Using Dragons Lane for access and ongoing maintenance for Oakendene substation. Using anything other than light vehicles. The lane is a private unmade, single-track road and is a bridleway. It is not suitable for HGV`S as it is narrow in places. Two properties, [REDACTED] form the boundary of the lane. As converted outbuilding there are no footings. There is a high risk of structural damage both properties. Families and animals use the lane purely as access to their property. There is also a very real danger to people and resident wildlife. Please can you confirm our concerns will be taken into serious consideration. "*

Until the heads of terms were issued in April 2024, he had had no further contact from Rampion. There had been no attempt to address any of his concerns. He is listed as 'Draft under Discussion', which is clearly untrue. He is also not aware of meaningful attempts to contact him. '*Further explanation of the anticipated* use' is, surely, fairly fundamental to being able to progress this, plus the build-up, not erosion, of trust with the affected party.

As you will see from the Heads of Terms letter, there is nothing in the letter which explains *why* they want this part of his garden, or what for. How can he sign anything without a proper understanding of what he is agreeing to? If Dragons Lane is genuinely only to be used for operational purposes and for light vehicles, why do they need this piece of land? Light vehicles can pass up and down currently. If they are intending to use it for HGVs, they need to be honest about this, and in any case, this acquisition does nothing to address the HGV access ie the pinch point, which is between the two buildings of homes on opposite sides of the lane.

In addition, the neighbour opposite owns the land under which lies the drain for the communal Klargester of the two properties. Rampion wish to purchase this. Again; why?

In both these instances, the affected parties are not in a position to sign anything, and Rampion have not made the case for why they need the land or, if they do need access, why Compulsory Acquisition is necessary as opposed to right of access over it.

There are other local landowners in similar positions, many of whom have not felt empowered to submit even a relevant representation. This is no doubt the same up and down the county, with landowners feeling confused, fearful and worried. This leads to suspicion and mistrust.

There are other local residents who have endeavoured on numerous occasions to communicate with Rampion to try to understand why they want rights over their land (eg see previous submissions by APs 016, 018, 020 and 021 and CowfoldvRampion's Adequacy of Consultation submission p50) but without success.

The Land rights tracker (REP4-012) continues to overplay the progress being made. Their claims are not reflected at all in the CAH statements from APs and from local experience in Cowfold.

In the Applicant's Post Hearing Submission for CAH1 (REP4-073):

2c) Rampion's 'proper consideration' of the alternative routes suggested by APs is not credible and not reflected in the plaintive comments from APs. The owner of Cratemans tells us that on site visits, some agents had said there was no reason why they couldn't alter the route to comply with his suggestions, but he then found this had been ignored, and no plans had been altered after all.

2e) The applicant does not make a compelling case for CA: Many local landowners remain confused and scared because of the lack of engagement by Rampion, despite the statements in the land rights tracker, and they feel that Rampion are gearing towards CA rather than co-operation, possibly as a cheaper option.

The Wiston Estate deadline 4 submission, REP4-135 is a compelling documentation of the lack of engagement and the suspicion of the intention of CA, as is REP4-125 by Simon Kilham, and REP4-128 by Winckworth Sherwood for Susie Fischel. We endorse the latter's view of 'Discussion', and 'Engagement', and the fact that the Applicant is just not listening, as this reflects the experience of many dismayed land owners in this area, such as REP4-132 discussed above.

6.Water Neutrality and Flooding:

Water Neutrality:

HRA 2.3: Water Neutrality - Potential AEOI on Arun Valley SPA. Update the ExA on Natural England's position on the latest proposals by the Applicant to meet the water neutrality requirements in light of recent meetings and discussions held between Horsham DC, Natural England and the Applicant.

Our response: We now have a new Government with a huge majority; a party which has promised more aggressive house building. Rampion cannot reasonably take the water quota made available by the reduction in the HDC housing trajectory, as this may now have to be revised radically.

WE2.2: …the ExA requests the Applicant to submit clear evidence that the vehicle movements for tankering the required water have been included in the traffic modelling.

Our response: The inclusion or exclusion of Tankers, and indeed whether private cars arriving at A62 and A63 are actually included in the vehicle numbers, would be apparent if the applicant were to provide a detailed bill of quantities and traffic flows for each activity to be available for public scrutiny.

In any case, REPP4-070 para 2.3.3 indicates that tankers will still be needed for the haul roads, so they will still need to be factored in to the construction traffic numbers, including the vehicles going to compound A62 before going down Kent Street and other local haul roads such as A57 and A56. **At the moment there appears to be no plan for the holding of vehicles accessing these small access points, but it will be necessary, just as it is for Kent Street. Rampion have said the HGVs for A56 and A57 will come via Henfield. Where and how will they be held if not at Oakendene, but then how can they avoid Cowfold?** Another muddled, ill-thought -out plan.

Flooding:

Flood plain

Cratemans land and the area around the Cowfold Stream are on a level 3 flood plain. Commitment C117 states that there will be no work on a floodplain level 2 or 3 between October and February.

This conflicts with C21 which states that "Where vegetation removal is necessary, it will be scheduled over winter to avoid the bird breeding season." We have highlighted this on several occasions but it does not seem to have been addressed by the Applicant.

It is also at odds with C203, which commits that *"Preconstruction checks for ground nesting birds will take place in advance of construction works between late February and August. Where breeding birds are located species specific exclusion zones will be implemented within which no works can take place*".

Oakendene

After the first ISH, the applicant was asked to provide a much clearer map showing the extent of the 0.1% flood risk at Oakendene. This does not appear to have been done.

The Applicant is disingenuous in its continued repetition of the fact that Oakendene is not recognised as a high-risk flood area on official maps. As its parent company, Macquarie, is also the owner of Southern Water, the applicant should be well aware that flooding in areas not previously affected, is now a regular and widespread occurrence.

Isabelle Tree, speaking on Woman's Hour, 10th June, said we in this area are on 36m of clay. For six months of the year, you cannot take vehicles on to the land. It is one of the reasons they gave up farming at Knepp Castle. It is one of the reasons the substation should not be built at Oakendene. It is not just about the drainage plans, but about the feasibility of the construction itself. We have previously written about the Enso Energy tractor which had to be pulled out of the field to the south of the proposed substation site when bogged in whilst carrying out a survey.

We know from the flooding images at Collegewood Farm at the accompanied site visit in May, (REP4-131) that there are other areas which will be similarly affected. And yet Rampion have, without justification, *reduced* the maximum duration of the construction phase, not extended it. This just does not make sense.

WE 2.1 Operational Drainage at the Proposed Oakendene Substation;

Our response: The applicant should also explain how the depth of these basins is consistent with the presence of a UKPN 132kV cable which runs from NW to SE across the site and under the swale in the north eastern corner adjacent to Kent Street

7.Cumulative Impacts:

WSCC (REP4-086) Section 8.4 "*As a general point, WSCC are aware of a number of projects that may overlap with the Rampion 2 proposals. "*

In fact, *both* the solar farm at Burnthouse Lane (HDC reference DC/23/2172), and a battery storage farm at Wineham Lane just opposite the southern end of Kent Street (Mid Sussex reference DM/21/2276), are **now permitted**.

The Kent Street Battery Storage Farm (HDC reference DC/24/0054) is still under review, as are a further two battery storage farms on Wineham Lane and another on the other side of the A24 at Shipley. **The cumulative impacts, on this community, the landscape and ecology will be enormous, must be considered.**

In addition, any cumulative impacts of construction traffic must be taken into account.

8.Alternatives:

The consented battery storage farm mentioned above is actually on the site which was one of those under consideration for the Rampion 2 substation: Wineham Lane South. It is consented for 184 lithium ferrous phosphate batteries, 46 inverters, an office and a substation. **It will cover 7.2ha/17 acres** (more than the substation). One of the main reasons Rampion gave for discounting it was the fact that it was opposite the Royal Oak pub. If the site is deemed appropriate to build an even more extensive and potentially dangerous energy project, how could it not have been suitable for the Rampion substation? If necessary, they could have used the Wineham Lane North site as a compound, as they now propose to do with the western Oakendene compound (TCC-3, access A62).

It is still available; it would now just cost them more. However, at the time the alternative substation sites were under consideration, it was at most in the very earliest stages of applying to Mid Sussex, having only been submitted in June 2021, so this would not have been an issue. This site should be revisited given the ecological, traffic and flooding constraints which are now apparent at Oakendene, all of which are costly to deal with and should be weighed in the balance against the cost of compulsory purchase of the far less damaging Wineham Lane South. In any case the difference in damage should be set against the impact of *what has been consented*, not compared to what the *present* wildlife and habitat situation is.

If they had chosen the Wineham Lane South site, they would have been using a road specifically widened and concreted for this purpose in the 1960s. They would **not** be:

- Destroying the lives of residents and users of tiny Kent Street, and **possibly avoiding Michelgrove and Tolmare Farm lanes in the SDNP also.**
- Preventing the residents of Kings Lane/Moatfield lane from leaving their homes
- Destroying the Green Lane and Cratemans irreplaceable special habitats, including nightingale and turtle dove territories
- Removing hundreds of metres of hedges and mature trees from Oakendene and Kent Street
- Disrupting the lives of the 18000 daily users of the A272 in each direction (the Wineham Lane /A272 junction is not a bottle-neck point as the A281/A272 junction is in Cowfold and there would only be one access point off the busy A272, not three)
- Impacting the Cowfold AQMA or the congested A281/A272 junction
- Causing substantial harm to the Grade 2 listed Oakendene Manor
- Placing the substation at a location where it is so terribly visible to so many people

REP4-135 from the Wiston Estate provides a critique of the alternative cable routes and main substation choices. It makes use of the Alternatives document from the E-on submissions for Rampion 1.

The E-on Alternatives document states:

*3.8.3 In addition to the guidelines set out in the Horlock Rules, the substation site selection criteria included the following considerations: • **Proximity to existing transmission infrastructure in order to minimise the level of transmission system development required**; • Distance from residential properties; • Engineering and constructability considerations such as **topography and flood risk**; • Access for construction and inspection and maintenance staff and equipment; and • Land ownership.*

3.8.6 Through 2011, further assessment of environmental and technical factors led to the potential area for a substation site being narrowed down to an area of search extending from the east of the existing substation site round to the north of the site. The area to the south of the existing substation was ***discounted due to the presence of several UK Power Networks 132kV underground cable circuits running along the southern boundary of the existing substation****.*

If proximity to the existing infrastructure was so important then, why did they choose a site so much further away this time? Why did they choose Oakendene when it is lower and much more at risk of flooding? Why, when sites were discounted even for consideration last time due to the presence of UKPN 132kV underground cables have they chosen a site with such a cable under it, and this cable requires to be crossed by the 400kV cable at least once on the route to the main Wineham substation. Worse still, they continue to keep very quiet about this issue and have not addressed it in any of their design plans.

TE 2.5 Potential loss of Category A Trees: Comment on the West Sussex CC response [REP4-086] at Deadline 4 to TE1.7 which states: "Whilst welcomed to hear that the Applicant carried out a tree survey prior to determining the substation location and that veteran trees and priority habitats were considered, the Applicant's response lacks confidence that assigned tree values in accordance with BS5837:2012 were a consideration for selection of any substation location. The location has a proposed loss of 11 of the 14 'A category' trees identified across the entire DCO Limits". Justify the proposed loss of 11 of the 14 'A category trees' identified within the DCO limits and explain what other alternatives to the proposed tree loss at the proposed Oakendene substation location were considered, in terms of both alternative sites and alternatives to tree loss at Oakendene.

Our response: We do not believe that Rampion *did* consider the destruction of these trees and the hedgerows until after the decision to choose Oakendene was made. When they did eventually hold their first meeting with local residents, in November 2022, ie *after* the decision was made, they had not decided the exact location of the substation within the site, nor the access to the substation. Even though the PEIR Alternative document does state that "*Access to the site would be directly from the A272, which is subject to agreement by Highways England",* they were openly entertaining ideas that it could perhaps be accessed through the industrial estate and be placed south of Oakendene Manor. No mention is made in the PEIR assessment of Oakendene of the potential tree and hedge loss. They therefore did not factor it in to the consideration of their 'marginal preference'. We completely understand if discussion with the owner of the manor house might have led them to move the substation to the east, but if so, it is shocking that they were only having this conversation with him so late in the day. Otherwise, if they had already decided this point, their conversations with residents were misleading at best; there is no third possibility.

The Hedgerow Survey Report, Doc Ref 6.4.22.5) as for many of the surveys, was not completed until 2023: we know, therefore, that this assessment was not done before the substation site was chosen. There is no mention of the hedge and tree loss in their consideration of the Alternatives, just the woodland which is close to, but unaffected by, Wineham Lane North. All of the extensive destruction of hedges and trees is the result of the way they have found themselves constrained on the site due to lack of consultation and therefore understanding of the issues this site faces. The alternative sites at Wineham do not require the removal of so much valuable habitat or wildlife corridors. They have not considered this in the weighing up of the alternatives.

Since this issue has been raised, we see, as in so many other areas of the DCO, a downplaying of the ecological importance and significance of the trees and hedges at Oakendene in an attempt to pretend that it doesn't really matter, just as we see with the green lane and Cratemans farm.

From Outline CoCP (Doc ref 7.2):*" Avoid removing landscape elements, particularly where these are key characteristics and or veteran or mature trees, woodland and hedgerows as far as practical (C-21, C-23, C-115 and C-174)."* There IS a practical alternative at Wineham Lane, which would involve the removal of fewer of these key characteristics, being a more open landscape. Instead, they appear to have chosen a site for its *maximum destruction* potential of just such features.

9.Conclusion:

From the Applicant's Response to Deadline 3 submissions (REP4-070), para 1.2.2 "*The Applicant has taken the opportunity to review each submission received into the Examination at Deadline 3. In this document,* ***the Applicant has focussed on responding to submissions made at Deadline 3 only where it will be helpful to the Examining Authority to do so.*** *This document therefore focuses on comments that have not already been made by Interested Parties and responded to by the Applicant*."

We are interested in the fact that the Applicant has chosen not to comment about the deadline 3 submission from CowfoldvRampion at all. Perhaps they do not wish to draw the ExA's attention to these comments about the Ecological and Landscape and Visual impact of the additional hedge and tree loss, Kent Street CTMP, traffic impacts, tankers and traffic survey methodology. We are grateful to the ExA for picking up these topics despite Rampion's attempt to sidestep them.

At OFHs and in WRs we hear repeated common themes of lack of engagement with landowners, poor consultation, riding roughshod over small farmers, overplaying of the extent of discussion with Affected Parties.

The environs of historic Cowfold parish are wholly unsuitable to sustain the Rampion 2 substation proposal with its associated aspects and impacts throughout, in particular, but not exclusively, the construction phase.

It is now obvious, as Rampion develop their plans (which they should have done *before* submitting the DCO), that so much more hedge and tree loss will be needed. It seems however, that we have not yet seen the full extent, as their plans continue to evolve, even at this late stage. This must be taken in to account when considering biodiversity loss, net gain and landscape and visual impacts, and of course the overall benefit of this proposal versus the damage to the environment.

There was significant concern about hedge and tree loss at the Alternatives ISH, and whether this had been taken into account when considering the substation site and yet we see now that the reality is to be even more terrible. The cumulative impact will be devastating visually and ecologically, the extent of the proposed destruction of the habitats at Cratemans and the green lane are becoming increasingly apparent. The traffic impacts are dire, the economic effects much worse than at Wineham Lane: the **'marginal preference' for Oakendene should be revisited.**

Appendices:

Appendix 1-Transport Planning Associates briefing report

We commissioned a report from TPA to look at the methodology used by Rampion, in order to review the transport evidence submitted in support of the Rampion 2 offshore wind farm, focussing on the potential impact of the scheme on Cowfold and its surrounding highway network, and the methodology used to assess the impact.

This confirms many of our concerns, based on the following comments from the report:

- The lack of clarity surrounding vehicle numbers, particularly private vehicles arriving at and leaving the compounds each day "*It is unclear how many construction workers will be on each site during each of its peak, or how many sites will be active at any one time.*"

- There is lack of clarity about HGV routes "*It is unclear how the distribution percentages set out within Table 6-2 [of the Traffic Generation Technical Note [REP3-022] have been determined and detail further detail should be provided so that the assumptions made can be checked.*"

- There is lack of clarity about whether LGVs do include private vehicles and clarity should be sought, with evidence. **"** *We would advise that the calculations are made more transparent for the next issue with flow diagrams (and details of their calculation) provided for each during the assessment scenarios." "I note the flow diagrams only refer to LGVs so they should clarify what is included in that calculation."*

- There are conflicting statements and diagrams regarding traffic movements eg **"***With regard to the routes, we note that A-62, A-63, and A-68 all include routes from the A24 west of Cowfold which appears to contradict C-157". "Commitments for HGVs to avoid Cowfold do not seem to have been allowed for in the flow diagrams*."

  "*We note that the HGV access routes shown in figure 23.18 do not align with those shown in the Construction Traffic Management Plan*"

  With regard to Commitment C-157 and c-158 *"Due to the location of the Oakendene compound significant diversion/ construction routes would be required to accomplish this. In addition, we note that both LGV and HGV routes are shown passing through Cowfold, with a route following the A272 to the west*."

  "*With regard to movements travelling on the A281, as shown in Figure 5.1 these would include vehicles travelling to access A-52 to A-58. Notwithstanding this, we note that C-157 states that 'For Cowfold, this means that HGVs will only route through the village centre for trips related to accesses A-56 or A-57 or where use of locally sourced materials / equipment make its avoidance impracticable'. It is unclear what route is proposed to accesses A-52 to A-55 and A-58."* In fact, we now know they are proposing to bring some of these vehicles, totally unsuitably, through the narrow Henfield High Street and the restricted roundabout in Upper Beeding. The Applicant must demonstrate that this is possible, with good swept path diagrams. Also, how will a holding

bay be arranged for these huge vehicles to prevent them from clogging up the A281 or the haul roads off it?
The author of this Appendix recently went down the Henfield to Upper Beeding route behind an ordinary single decker bus. Even this was frequently covering not only its own carriageway but part of the opposite carriageway on certain parts of the road.

- There needs to be greater clarity regarding flow diagrams. eg "*we note that there appears to be some errors within the flow diagrams which should be resolved and reissued. I've set out two examples below:*
1) Figure 23.1 42285-WSPE-ES-ON-FG-OT-531 dated 8 August 2023
Notes: 22 movements approach the A283 southbound on the A2037 and become 33 movements at the next junction, and 18 ahead movements at the Steyning junction become 11.
2) Figure 23.1 42285-WSPE-ES-ON-FG-OT-531 dated 8 August 2023
Notes: 43 movements approach the southern Cowfold roundabout, but only 5 LGV movements are recorded at the roundabout."

- The bill of quantities is not clear in the assumptions made for traffic generation:
"*It is unclear how many construction workers will be on each site during each of its peak, or how many sites will be active at any one time. Further details should be provided so that the traffic generation can be reviewed."*
"The Traffic Generation Technical Note is not entirely clear on the assumptions made, but states that they are based on the latest bill of quantities. As set out above in this Briefing Note, we would advise that clarity is sought as to the calculations undertaken for transparency. For example, for each gateway we would expect to see that there is a predicted X tonnes of material needed to be transported and that this would be done on lorries with a capacity of Y tonnes resulting in Z movements. Similarly, we would expect to see that X metres of cable were required and that each vehicle would be able to bring Y metres of cable resulting in Z movements."

- The traffic numbers on the A272 seem low compared to the smaller Rampion 1, especially as the private vehicles did not travel on the A272 for Rampion 1.
"*The quantum of movements predicted for Rampion 2 is lower than that predicted for Rampion 1. Based on the information provided we understand that the quantum of movements has been calculated based upon the assumed bill of quantities and therefore it is possible that the difference is due to reduced works being required.".* If this is so, the Applicant should be able to provide convincing evidence of this, as Rampion 2 is a larger project.

- *"There is no commitment for LGVs/LVs to avoid the Cowfold AQMA or to adhere to specific routes and they are likely therefore to take the shortest or quickest routes. This is evident in Table 6-1 which sets out the distribution for LGVs and includes movements to network entry/ exit points on the A24 and the A272 west which would both require a movement through Cowfold from the Oakendene compounds."*

- *"Table 6-2 assumes that 43% of LGV movements from the Oakendene Compounds would be routed from the A272 (W), A24, A27 (W), and therefore a significant number of movements could be expected to pass through Cowfold's AQMA."*

- The shoulder hours, which were proposed by Bolney Parish Council to ensure only *quiet* activities during those times, have instead been hijacked by Rampion as an opportunity to extend the delivery and unloading hours. *"In the context of the above we expect that the impact of the proposals on the local highway network will span from 07:00-19:00 Monday to Friday. In our experience, construction traffic would typically be restricted to avoid the network peak hours to limit the potential impact of the movements on the operation of the network during peak periods. In this context we would expect construction deliveries to be restricted to between 09:00 and 17:00 as a minimum."*

- "*We note that they have not restricted movements during the traditional peak hours, or at times when local schools are operational as would usually be done for construction projects*.". In fact, they *have* in a separate document proposed restriction of movements of HGVs to A56 and A57 at school hours (Paragraph 8.4.18 of the Outline Construction Traffic Management Plan):

  "*During the weekday morning peak hour / school opening period (08:00 to 09:00), school closing period (15:00 to 16:00) and evening peak hour (17:00 to 18:00) HGV deliveries to:*

    - A-56 will be limited to 1 HGV delivery; and
    - A-57 will be limited to 2 HGV deliveries".

  But in fact, the children walk through the whole village, not just outside the school, and the majority live off the eastern A272, or go to play in the playground after school which is on the eastern A272, which they have to cross. There is also a school coach pick up and drop off point at the adjacent car park, and a scout hut further to the east. There is no restriction of construction traffic on this part of the A272, nor *any* restriction on LGV movements at all.

  In addition, it should be remembered that for the A272, as we have demonstrated at Deadline 4 (REP4-105), the peak traffic numbers begin from 7am or earlier, with little actual reduction during the middle of the day.
  "*In addition, we note the existing playground adjacent to the A272 at the Cowfold recreation ground, which would represent a high sensitivity receptor together with the wider recreation ground, though we note no receptor is located in its vicinity*."

- There is no evidence that the A272 from Cowfold to the A23 has been divided up for the assessment of traffic numbers and flow, although they say this is not unusual high-level practice. *However,* Rampion have stated on a number of occasions that they *have* taken the complex movements at the compounds and Kent Street and the approach to the mini roundabouts in to account when assessing impacts. They need to make the evidence clearly available if this is indeed so.

- There is currently no more complex assessment of the traffic EIA than percentage increase in numbers and that a more complex assessment should be done in accordance with IEMA guidelines Paragraph 2.17 of the IEMA Environmental Assessment of Traffic and Movement (2023) given the HDC evidence that the A272/A281 junction is congested.
  "*Capacity of a junction would be calculated using the number of vehicular arrivals to the junction and the parameters based upon the geometry. … Clearly the construction vehicles could impact upon the operation of the junction*"
  "There is also a requirement to consider the impact on users of the roads if the network is suffering from congestion in the peak hours of the day. This would open up the potential for looking at delay impact for construction traffic (including workforce."

- *"In addition, and in the context of the concerns raised in relation to the northern Cowfold roundabout in the Horsham District Plan evidence base, we would suggest that the following should be included for link 23. 'Highway links on the local and strategic network that currently suffered from congestion in the peak hours of the day may also need to be considered for further assessment as this has potential to impact on users of the road'. This would then start to look at issues such as delay and capacity"*

  "*Fundamentally the applicant should be demonstrating that they won't have an impact on users of the road if there is a pre-existing congestion and delay problem."*

  "Having briefly looked at Stantec's Horsham Transport Study (December 2022) the evidence provided suggests that in 2039 the A272/ A281 roundabout (i.e. the northern mini-roundabout in Cowfold) will be above its design capacity during the AM peak hours with a Ratio of Flow to Capacity of 102.2% without the local plan increasing to 103.6% with the local plan development. Typically, a priority junction would be considered to be at its design capacity when it is operating with a Ratio of Flow to capacity above 85%. Insufficient information is provided to determine how big part of the day the junction is operating above the maximum theoretical capacity." The Elan Cite report shows the traffic at the Cowfold mini roundabouts to be above 85% for much of the day. If this is not acceptable, Rampion themselves**, or preferably an independent traffic analyst, should be asked to determine this information.**

  Item 6 of Table 5-2 of the Outline Construction Traffic Management Plan continues to state that "*The traffic predictions in Chapter 23: Transport, Volume 2 of the ES (Document Reference: 6.2.23) indicated low daily traffic flows across a majority of the links assessed and discussions with WSCC and NH identified no need for detailed junction assessment or the provision of a Transport Assessment for the DCO Application."* This is **not** the same as saying they agreed they should NOT be done. These discussions were high level, in the early, scoping stages of the application and before a definitive choice of substation site had been made. We believe the HDC Stantec report, our own submissions, which show the traffic flows are not low, the junction is at capacity, and the fact that there is a complex layout across two mini roundabouts, make the case that the A281/A272 junction in Cowfold **should** require a much more detailed assessment. This would also be in line with IEMA guidelines.

  This is exactly the same kind of argument that SDNPA make about the lack of thorough assessment of dormouse by the Rampion surveys in TE1.10 (REP4-085): "*Whilst an objection was not raised to the principle of the approach proposed to be taken for surveying at pre-application stage, it was also not agreed. Such discussions were at a high-level and prior to the final route being determined. Since submission, as per our Written Representation [REP1- 052] and D3 submission [REP3-071], we consider the baseline is lacking. Overall,* ***the applicant has not evolved their approach with reference to new records*** *nor has it properly liaised with nature conservation organisations about species status and distribution in this area."*

- We have raised concerns about the proximity of the access points A63, A62 and Kent Street. TPA tell us "*The offset in distance between access points would be considered, but typically only for permanent junctions*." The Kent Street and the A63 junctions *are* permanent, and their proximity will lead to confusion about where a vehicle is intending to turn, with the potential for accidents. Similarly, at Oakendene industrial estate and the new access into A62, where

construction vehicles will have to *cross the path* of vehicles entering and leaving Oakendene. **These safety issues do not seem to have been considered by either WSCC or the Applicant.**

- The proposals contain many fanciful or meaningless items put there for effect eg:
  "In addition, we note that Paragraph 3.4.4 [of the outline operational travel plan] also states that the targets are based on RED's aim of 'encouraging workers to use sustainable travel modes wherever possible when travelling to Oakendene substation'."
  This is not a realistic option for Oakendene as the road is highly dangerous and there is no public transport.
  "*It is worth noting there are commitments to monitoring and review, as well as the 'cycling facilities, electric vehicle charging stations, priority parking for car share, and public transport timetables are all proposed to encourage the modal shift away from individual car usage' (para 3.5.1)"*
  What does priority parking mean? Are the rest going to be left to block up the village streets and lanes?
  "*The targets set within the Travel Plan do not appear to be time bound, with no deadlines for achieving the targets set, and do not appear to align with the second aim, namely to 'maximise the sustainable movement of the operational workforce […]'(para 3.2.1)Fundamentally Table 3-1 of the Travel Plan seeks to shift remove one car trip in every 50 from the highway network, replacing that trip with a car sharing trip. There appears to be no ambition or belief in the measure proposed to achieve the aims set out previously."*

- "*In addition, we note that there appears to no enforcement measures in place should the Construction Management Plan not be adhered to for a prolonged period of time. The enforcement section limits RED to monitoring and implementing corrective measures to 'resolve, redress and enhance service performance, which is in breach of the standard within the Outline CTMP, para 9.2.5'and that RED will require that the appointed contractor includes the commitments set out within the commitment register. We would suggest that continual (and evidenced) disregard for the commitments made within the CTMP should result in a fine or similar."*

- "*Evidence that the vehicular movements were not taking place in the vicinity of key receptors (such as residents) during network peak hours would be a reasonable request."* Instead, they propose no such thing for the residents and businesses on the eastern A272 or Kent Street, only in relation to the western A272 and vehicles passing through there to A56 and A57

- *"We also note that National Highways requested the morning and evening peak hours were set out in flow diagrams and these do not appear to have been provided.* ***These flow diagrams should allow for workforce travel*** *in addition to movements of LGVs and HGVs*."

- "*Turning to the receptors identified as potentially requiring assessment* ***we note that cyclists have not been included as a receptor on any links*** *(including the Cowfold links 23, 24, and 25) despite being identified in table 23-10 as a receptor. Given the rural nature of the site there is potential for cyclists to use the carriageway for leisure purposes and consideration should be given to the impact the construction movements would have on them."* Cyclists certainly do use the A272 and A281, but this is particularly important for Kent Street which we know to be a well-used cycle route by individuals and cycling clubs.

- *"Further details should be provided setting out the assumptions around vehicle movements with clarity on the size of vehicle and quantity of material being transported. It is likely that these calculations have been undertaken,* ***however they should be presented in a transparent matter enabling public scrutiny.*** *In addition, some of the assumed vehicle movements appear to contradict the commitments made and therefore further clarity should be sought."*

Regarding the Kent Street proposals:

- Swept path analysis of the A272 /Kent Street junction*: "it appears as though the OS mapping is missing the northern verge giving a false width of the A272."* We have already pointed out that the wheels on the swept path analysis appear to be almost in the hedge. Therefore, we have no confidence that the swept path analysis shows the manoeuvre is actually possible.

- Passing Places*: "Further details of the widening should be provided including a minimum carriageway width to determine whether two 'large vehicles' can pass."* Particularly given the huge dimensions of some of these vehicles and their ability to pass, for example, large horse boxes or farm machinery.
  "[from satellite images] larger vehicles would be unable to use the passing places which would instead be used by the LGVs. It would be important to understand what the likelihood is of two larger HGVs meeting is and how the applicant proposes to stop this from occurring at all. To minimise the impact, you should seek to provide passing places which are ***sufficient to allow two 16.5m articulated vehicle to pass." C*****urrently no minimum carriageway width is provided for the passing places.**

- *"More broadly, any improvements, temporary or otherwise, should be subject to the Road Safety Audits undertaken by* ***an independent Road Safety Auditor*** *in the context of the anticipated flows. These should pick up on the likelihood of conflict between construction traffic and vulnerable road users, such as pedestrians, cyclists and equestrians, and whether the proposed mitigation is sufficient."*

- A-64 is immediately to the south of the bridge. Nowhere in the plan is anything showing how they will get in and out of A-61 and A-64 with these enormous vehicles. *"We would expect swept path analysis to be provided for all access locations to demonstrate that:*

  i The access proposed is of sufficient width to accommodate the vehicles proposed;

  ii The impact of the proposed access and visibility splays on the surrounding vegetation; and

  iii To demonstrate that the secure line was sufficiently set back to enable delivery vehicles to stop outside of the public highway where appropriate to not block the free flow of traffic. "

All of the above shows how little true understanding is possible from the almost exclusively desk top evaluation of the impacts done by Rampion, and why it is crucial to take account of evidence and information from local residents with local knowledge, before choosing a site. (We remind the reader of the lack of impact of Rampion 1 on A272 as a whole or the Cowfold AQMA.) Rampion did not do this. Even HDC and WSCC seemed unaware of the implications when consulted by Rampion, however, this may have been because in the early scoping stages the focus was not particularly on the impact of *construction of a substation at Cowfold,* but more generally on the effect of traffic on the A272 as a whole, with focus on Wineham Lane.

Appendix 2- Rampion 1 Transport Documents

Rampion Offshore Wind Farm

ES Section 29 – Transport

RSK Environmental Ltd **Document 6.1.29**

December 2012 **APFP Regulation 5(2)(a)**

Revision A

E.ON Climate & Renewables UK Rampion Offshore Wind Limited

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Tables

29 TRANSPORT

29.1 Introduction

29.1.1 This section of the Environmental Statement (ES) provides an understanding of the baseline transport environment local to the proposed onshore cable route and onshore substation site for the Rampion Offshore Wind Farm (the Project). It includes traffic, access and routing, delivery of abnormal loads and considers the possible direct or indirect effects that construction and operation of the proposed development could have on this environment. The section also details methods by which these potential impacts can be mitigated.

29.2 Legislation and Policy Context

29.2.1 Transport is an important focus within a number of key national and local policies, which help to deliver sustainable development, protect road users and ensure mitigation is provided where necessary.

29.2.2 National Policy Statements (NPS) provide the primary basis on which the Secretary of State is required to make its decisions. *The Overarching National Policy Statement for Energy (EN-1)* contains generic requirements for assessment of impacts arising from traffic associated with the design, construction and operation of renewable energy infrastructure.

29.2.3 Paragraph 5.13.3 states: *'If a project is likely to have significant transport implications, the applicant's ES should include a transport assessment, using the NATA/WebTAG methodology stipulated in Department for Transport guidance, or any successor to such methodology'*.

29.2.4 Paragraph 5.13.4 states *'Where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts'*.

29.2.5 *The National Planning Policy Framework* (NPPF)(March 2012) provides national guidance on transport matters to guide the development of the Local Plan and Local Transport Plan.

29.2.6 The *Guidelines for the Environmental Assessment of Road Traffic* produced by the Institute of Environmental Assessment (IEA) in 1993 is adopted for the assessment of the environmental effect of road traffic associated with major new developments.

29.2.7 The following rules, taken from the IEA guidelines, have been used as a screening process to define the scale and extent of this assessment:

- Rule 1 – Include road links where traffic flows would increase by more than 30% (or the number of Heavy Goods Vehicles (HGVs) would increase by more than 30%); and

- Rule 2 – Include any other specifically sensitive areas where traffic flows would increase by 10% or more.

29.2.8 Further guidance is provided by the Department for Transport's publication *Guidance on Transport Assessment* (March 2007), which sets out the criteria for assessment of transport impacts of developments.

29.2.9 Locally, the 'West Sussex Transport Plan 2011—2026' identifies the principal transport policies for the area through which the onshore cable route will run. The document focuses on four key areas: promoting economic growth; tackling climate change; providing access to services, employment and housing; and improving safety, security and health.

29.2.10 As part of promoting economic growth, there is a requirement to maintain or improve the reliability of journey times on key routes. In the context of the proposed development, this will be done by "ensuring that new development has nil detriment on the level of service on the SRN [Strategic Road Network]". This will be achieved by minimising delays to traffic during construction while during operation the development will generate virtually no traffic.

29.2.11 The West Sussex Transport Plan includes commitments that contribute towards the Council's climate change strategy. West Sussex County Council aims to "maximise reuse and recycling of materials in construction". In the context of the cable route, as far as possible, material removed from the ground during trench construction will be replaced following laying of ducting and the ground re-grading. This will minimise the need to import or export fill material in the construction process. However, where horizontal directional drilling (HDD) methods of construction are used, or where contaminated material is identified, there will be a need to remove material off-site. No assessment has been made of contaminated material to establish whether any removal off site would be required and therefore no such allowance has been made in the assessment of traffic movements.

29.2.12 As part of the West Sussex Transport Plan, freight management will be one of the travel modes that contribute towards the main objectives. One of the key aspects in the Council's approach is "minimising construction traffic – identifying and assessing lorry routes for construction traffic". As part of the development proposals, potential construction access routes have been identified (see Section 29.5) and HGVs associated with the construction process are likely to be restricted to those routes, subject to agreement between the contractor and relevant highway authorities.

29.2.13 This will include addressing one of the identified issues in Adur to "minimise the impact of HGVs on the local community" by "encouraging HGVs to use the advisory lorry route network". Similarly in Horsham "in order to avoid congestion and maintain journey times HGVs are diverting onto unsuitable residential and rural roads, causing concerns over safety". Again, suitable construction access routes have been identified (see Section 29.5) which will "[encourage] HGVs to use the advisory lorry route network" wherever possible.

29.3 Assessment Methodology

Establishment of Baseline Environment

29.3.1 A desk-based assessment of the onshore components of the proposed development included a review of the strategic and local highway network, together with historic traffic data for these networks.

29.3.2 A preliminary assessment, including a site visit and highways network video recording, was undertaken in November 2010 to assess the suitability of the surrounding road network to accommodate construction traffic and abnormal loads associated with the proposed development.

Scoping and Consultation

29.3.3 As part of the scoping phase of the Environmental Impact Assessment (EIA), a Scoping Report (E.ON/RSK, 2010) was prepared to set out the proposed approach to the EIA in respect of the proposed development, including the identification of assessment methodologies for each of the EIA topic areas to be assessed. The Scoping Report was submitted to the Infrastructure Planning Commission (IPC) in September 2010. A Scoping Opinion (IPC, October 2010) was received from the IPC in October 2010 incorporating comments from a wide range of consultees. A copy of the Scoping Report and Scoping Opinion including consultee comments are included in Appendix 5.1 and 5.2.

29.3.4 The information and advice received during the scoping process with regard to onshore transport issues is summarised in Table 29.1.

Table 29.1: Relevant Scoping Responses

Date	Consultee	Summary Scoping Response	Sections Where Addressed
27/09/2010	Sompting Parish Council	The impact on using the A27 and/or A259 for construction and operational use should be considered.	Paragraphs 29.4.10 to 29.4.13, 29.5.59 to 29.5.62 and Table 29.9
12/10/2010	West Sussex County Council	Consideration to be given to the location of construction compounds and stores of materials and routes to these areas, particularly HGV access. Consents will be required for works in	Paragraphs 29.5.4 to 29.5.10

Date	Consultee	Summary Scoping Response	Sections Where Addressed
		public highways. Information relating to traffic generation, vehicle routing and other temporary/accommodation works within the limits of the public highway to be provided. Neighbouring Highways Authorities and the Highways Agency should also be consulted.	Paragraphs 29.5.22 to 29.5.53
12/10/2010	Brighton & Hove City Council	Traffic section should include more detail (i.e. quantify) the traffic generated during operation. As per government guidance the traffic assessment should take into account indicative thresholds with reference to freight, HGV movements, inadequate local transport infrastructure and proximity to an AQMA and further data on transport impacts should be provided.	Paragraphs 29.5.59 to 29.5.62, 29.5.4 to 29.5.19 and Table 29.9
October 2010	Infrastructure Planning Commission (IPC)	The assessment of the vehicles associated with the construction of the offshore development including both delivery vehicles and personnel vehicles, abnormal loads, if applicable, and traffic associated with maintenance will need to be considered in the ES. Assumptions made to derive the traffic forecasts will need to be clearly explained.	Paragraphs 29.5.4 to 29.5.53 and Table 29.9

29.3.5 The proposals have been discussed with the relevant highway authorities, these being the Highways Agency, which is responsible for the A27 trunk road, and West Sussex County Council, which is responsible for all other roads in the vicinity of the onshore works.

29.3.6 A meeting was held on 9 November 2010 with various representatives from both authorities, during which the proposals were presented followed by a question and answer session. Several queries that were unanswerable at the meeting were formally responded to on 11 January 2011.

29.3.7 Both authorities noted the significance of the proposed onshore works and the potential disruption to the highway network, subject to construction methods. The key aspects requested to be considered within the assessment of traffic impact were the siting of compounds, materials storage, construction routes and frequency of movements. Further consultation will be necessary with their abnormal loads teams who will advise in relation to detailed routing of vehicles transporting large loads to the construction sites.

29.3.8 The scope of the assessment was modified accordingly to take account of the above consultee responses and the opinions of the IPC, the findings of which were reported in a Draft ES.

29.3.9 As detailed in Section 5 – EIA Methodology, an extensive programme of engagement has been undertaken with regard to the Project; details of which are provided in the Consultation Report (which accompanies the Development Consent Order (DCO) application). This included publication of the Draft ES as part of the Section 42 and Section 48 consultation.

29.3.10 Following a review of consultee feedback on the Draft ES, the following modifications were made to the Project and overall assessment scope:

- Details of access to the proposed substation for construction purposes have been reviewed; and
- Details of access and methodology at Tottington Mount have been reviewed.

29.3.11 Full details of the consultation process and associated outcomes are documented in Document 5.1 [Consultation Report].

Identification and Assessment of Impacts and Mitigation Measures

29.3.12 Assessment of the transport network is based on the information from the preliminary and desk-based assessments.

29.3.13 A judgement has been made on the importance and/or sensitivity of the receptor(s) involved, as indicated in Table 29.2.

Table 29.2: Importance/Sensitivity of the transport network

Receptor Sensitivity	Definitions
High	Receptors such as schools and hospitals Roads with significant restrictions on the numbers/types of vehicles predicted to run during construction/operation (e.g. significant width/height/weight restrictions) Roads with a high level of existing congestion/traffic Roads used by pedestrians and horses Roads or accesses with poor visibility Operational railway lines Closure of an 'A' road
Medium	Roads not designed for the traffic predicted to run during construction or operation, where some difficulties are predicted Closure of local road
Low	Roads with minor or no restrictions in relation to predicted traffic levels

29.3.14 A large magnitude change would be one that is likely to cause a direct adverse permanent or long-term impact on the integrity/value of the receptor, whereas a small change would be one that is likely to have a minor adverse impact on a receptor, but from which recovery is expected in the short term.

29.3.15 Table 29.3 gives examples of levels of magnitudes of change on traffic and transportation.

Table 29.3: Magnitudes of Impact on Traffic and Transportation

Magnitude	Definitions
Large	A permanent increase in traffic flows that leads to severe congestion or severe inconvenience to other road users
Medium	A temporary increase in traffic flows that leads to severe congestion or to severe impacts on other road users A permanent increase in traffic flow leading to some congestion or other impacts
Small	A permanent or temporary increase in traffic flows with minor impacts to roads
Negligible	No (or very minimal) detectable effects
Beneficial	A reduction in traffic flows with beneficial impacts.

Significance of Residual Effects

29.3.16 An assessment has been made of the significance of residual effects, i.e. those impacts that are predicted to remain after the mitigation measures outlined in this ES have been implemented.

29.3.17 The categories used when classifying overall significance are indicated in Table 29.4.

Table 29.4: Significance of Effects on the Transport Network

		Sensitivity		
		High	**Medium**	**Low**
Magnitude of Change	**Major**	Highly Significant	Moderately Significant	Slightly Significant
	Moderate	Moderately Significant	Slightly Significant	Not Significant
	Minor	Slightly Significant	Not Significant	Not Significant
	Negligible	Not Significant	Not Significant	Not Significant

29.4 Baseline Conditions

Site Description

29.4.1 The onshore elements of the proposed development will include the construction of a cable route from the offshore cable landfall to a new substation in the vicinity of the existing National Grid Bolney substation. The cable will be buried along its entire length and will encompass a permanent easement width of 15m. For construction purposes, a nominal working width of 30m will be required for the majority of the cable route, with some larger working areas required in some key locations, while constraints may restrict the working width in other areas. Temporary site compounds will be required to store materials and heavy plant during construction.

29.4.2 The onshore cable route will cover a distance of approximately 26.4km measured from Mean High Water Springs (MHWS).The route will pass under the A259 Brighton Road and head northwards between East Worthing and Lancing, crossing the A27 and running eastwards to cross under the River Adur before leading in a generally northeasterly direction then northwards, east of the A2037 and A281, to the new substation, located in the vicinity of the existing Bolney substation.

29.4.3 The cable route crosses open land with numerous crossings of roads, including the A259, A27 trunk road, A283, A281, as well as various watercourses including the River Adur and a railway line. The topography of the route is significantly affected by the South Downs, while the remainder of the route is generally flat.

29.4.4 The study area for transport covers all road crossings of the route and the connecting links to the major road network for construction traffic and abnormal load routing purposes.

Local Highway Network

29.4.5 The extent of the onshore cable route, and the resultant construction works, results in a significant study area. This study focuses on the overall network to be used by construction traffic for all onshore activity, which includes a number of different routes owing to the number of potential access points along the construction site.

29.4.6 The road network surrounding the site is dominated by the A27 and A23 trunk roads, which are the responsibility of the Highways Agency. The A27 follows the south coast, primarily in dual carriageway form, connecting Chichester and Eastbourne, and locally serves Worthing and Brighton. The A23, again primarily in dual carriageway form, connects the A27 with the M25 and locally provides easy access to Crawley and Burgess Hill.

29.4.7 The A27 crosses the southern end of the site, offering connections into East Worthing, Sompting, Lancing and Shoreham-by-Sea. These connecting roads are characterised by single carriageways passing through urban areas with traffic signal controlled junctions, roundabouts or priority junctions. They are generally subject to a 30mph speed limit.

29.4.8 North of the A27, the A283 connects Shoreham-by-Sea to Upper Beeding and Steyning, from which the A2037 leads northwards to Henfield. At Henfield the A281 leads north to Cowfold and the A272, and leads east to the A23. These roads are characterised as single-carriageway rural strategic routes, passing through small towns and villages, providing connectivity to the trunk road network. They are generally subject to a 60mph speed limit, except where they pass through settlements where the limit typically reduces to 40mph.

29.4.9 Numerous minor roads and a few B classified roads provide local connectivity to the A road network. These roads are characterised as single-carriageway rural roads and lanes, passing through villages and hamlets, often winding and sometimes narrow. These roads are typically subject to a speed limit of 40mph.

Traffic Data

29.4.10 In light of the local road network, the likely routes that construction traffic will use, and the expected locations of major construction access, traffic data has been acquired for a variety of road links. The Highways Agency maintains continuous traffic counters across their network, providing an important source that can identify data trends on a daily, weekly, monthly and yearly basis. Similarly, West Sussex County Council holds traffic count data for a variety of locations within the study area.

29.4.11 The Highways Agency data for the A27 offers three useful locations in the context of the study area, indicating that two-way flows range from around 40,000 vehicles per day near the junction with the A24 to the west and up to 70,000 vehicles per day east of the A283.

29.4.12 The A283, just north of the A27, carries up to 22,000 vehicles per day, while the A2037 and A281 carry around 8,000 vehicles per day. The A272, which crosses the northern end of the study area, carries around 16,000 vehicles per day. Flows on the minor roads within the study area typically carry significantly less traffic per day.

29.4.13 Details of the traffic flows are provided at Appendix 29.1, while a profile of the level of traffic experienced throughout a weekday along the A27 is provided at Appendix 29.2 as an indication of the profile for the study area.

Sensitive Receptors

29.4.14 In order to establish the sensitive receptors along the routes to the construction site, a desktop study was undertaken, examining Ordnance Survey maps. This study identified a total of 10 schools close to the cable route construction path (see Section 28 – Onshore Socio-economics). The study also identified the operational railway line and the A27 trunk road, which is a heavily trafficked road, as sensitive receptors. Each of these receptor types is identified as being of 'high sensitivity' in Table 29.2.

29.5 Assessment of Impacts

Rochdale Envelope Principles

29.5.1 In line with the use of the "Rochdale Envelope" (see Section 5 – EIA Methodology), the assessment in this section has been based on a development scenario, which is considered to be the worst case in terms of impacts on the transport environment. Rochdale Envelope principles relating to impacts on the traffic environment relate primarily to volumes of development traffic and abnormal loads. Vehicle movements are listed in Table 29.5 to 29.8 below.

Impacts during Construction

29.5.2 The following transport related sources are typically associated with construction works and are considered relevant to this site as potentially resulting in significant impacts:

- Access to the construction site in terms of capacity and highway safety;
- Road crossings of the cable route, specifically where trench construction is required;
- Vehicles associated with construction of the development, including workers, trade vehicles, heavy goods vehicles and plant delivery; and
- Abnormal loads, including the impact on highway geometry and interruption to traffic flows on the network.

29.5.3 Details of the above sources relevant to this assessment are set out below.

Cable Route Site Compounds

29.5.4 A description of site compounds is given in Section 2b – Project Description (Onshore), which sets out that there will be a main compound and several satellite compounds.

29.5.5 In summary, the main compound would be used throughout the construction period, providing a central management point for the whole cable route construction. Satellite compounds would be used for section specific activities and would only be established for as long as that section was under construction. The exact locations of the compounds have not yet been identified as the principal contractor will have an input into the decision process. The final locations will be chosen to allow easy access to and from the cable route whilst also minimising impact on local residents, businesses and the environment, wherever possible.

29.5.6 The construction of the onshore cable route will cross two dual carriageways, a river and a railway line. These major crossings will each require directional drilling in order to minimise disruption to traffic and trains and avoid potentially difficult hydrological conditions. HDD will be used at the following locations:

- A259 Brighton Road – as part of the landfall works;
- Worthing to Brighton railway line;
- A27 Sompting Bypass; and
- River Adur.

29.5.7 Each of these construction sites will be accessed from either side as these identified crossings create a physical gap in the accessible route.

29.5.8 The eight cable route sections are outlined below and are illustrated at Appendix 29.3:

- Route section 1: Landfall to south of the railway;
- Route section 2: North of the railway to Sompting bypass;
- Route section 3: Sompting bypass to crossing 03-06. Crossing 03-06 is the top of a steep gradient at Steep Down that would be unsuitable for heavy plant to travel down/up and hence must be accessed from either side;
- Route section 4: Crossing 03-07 (the base of the steep gradient described above) to the River Adur;
- Route section 5: River Adur to crossing 10-12. Crossing 10-12 is the top of a steep gradient situated to the north of Tottington Mount that would be unsuitable for heavy plant to travel down/up and hence must be accessed from either side;
- Route section 6: Crossing 10-13 (the base of the steep gradient described above) to the A281;
- Route section 7: The A281 to the B2116; and

- Route section 8: The B2116 to the proposed onshore substation.

29.5.9 For the purposes of this assessment, each section has been assumed to be dependent on either the main compound or require a satellite compound as a worst case assumption. In practice, the contractor may choose to serve more than one section from a single compound should it be more efficient to do so. It has been assumed that satellite compounds will be shared with HDD compounds where possible.

29.5.10 The assessment has been based on a main compound being located just to the north of Tottington Mount, on Edburton Road, as a possible location, though the contractor will select their preferred location. As a worst case assumption, satellite compounds have been assessed as being located on minor roads in preference to major roads.

Cable Route Site Access

29.5.11 The route sections outlined above will each require access from the highway network for the delivery of plant and materials to points along the route and to site compounds, including the establishment of compounds. The route to each section and potential access points have been reviewed to identify the affected roads and to minimise the potential impact by using major roads wherever possible.

29.5.12 The precise locations and alignment of all side accesses (to provide access from the adopted highway to the working width) along the cable route have yet to be confirmed, with the exception of two side accesses that have been identified and agreed with Worthing Borough Council south of the railway line.

29.5.13 For the purposes of this assessment, it has been assumed that the working width will be accessed directly from adjacent roads and/or existing farm tracks, and that no widening or vegetation (tree/hedgerow) removal would be required as a result of the side accesses.

29.5.14 Should any further side accesses be identified once the construction contractor has been engaged that are not located on existing farm tracks, or require widening of existing farm tracks, the location of these accesses would be subject to agreement with relevant local authorities.

29.5.15 The worst case assumptions made in the assessment of construction traffic include the assignment of vehicles to specific routes in order to reach a potential site compound for each section. These routes are summarised below, while a plan illustrating the potentially affected roads is provided at Appendix 29.4

- Landfall / route section 1 – from A27, along A2025 Grinstead Lane, onto A259 Brighton Road, and/or onto Western Road;

- Route section 2 – from A27, onto B2222 Upper Brighton Road;

- Route section 3 – from A27, onto Lambleys Lane;
- Route section 4 – from A27, onto Coombes Road;
- Route section 5 – from A27, onto A283 Steyning Road;
- Route section 5 (Tottington Mount) – from A27, onto A283 Steyning Road, onto Upper Shoreham Road, onto Erringham Road, onto Mill Hill;
- Route section 6 – from A27, onto A283 Steyning Road, onto A2037 Henfield Road, onto Edburton Road;
- Route section 7 – from A23, onto B2118, onto B2116 Henfield Road; and
- Route section 8 – from A23, onto A272 Cowfold Road, onto Wineham Lane.

Onshore Substation Site Access and Site Compound

29.5.16 The proposed onshore substation is located east of the existing National Grid Bolney substation.

29.5.17 Construction of the proposed substation will require the establishment of a site compound for the duration of the works, which will include messing facilities, offices and areas for storage of materials and equipment. This site compound could be used as a satellite compound for route section 8.

29.5.18 The route from the A23 to the site area will be via the A272 and Wineham Line. A temporary construction access will be created from a new bellmouth with Wineham Lane into private land situated directly north of the National Grid boundary. The access will traverse east toward the Rampion substation and will be in place for the duration of the construction works (approximately 2 year period).

29.5.19 Creating the construction access would form part of the substation enabling works and will take approximately 4-6 weeks. During this time access would need to be via the existing farm track from Bob lane, which will eventually become the permanent operational access. Thus, Bob Lane will initially be used for the delivery of plant, cabins and materials to enable the works on the construction access. The construction works would be phased in this way to ensure that traffic movements along Bob lane would be minimised as far as possible until the new temporary construction access is in use.

Construction Methods

29.5.20 The working width crosses a number of roads between landfall and the substation. Construction of the cable route will necessitate the use of trench excavation for the majority of these roads while a small number of crossings will be undertaken using HDD methods.

29.5.21 The HDD methods avoid disruption to existing traffic movements and will therefore have no impact on road crossings. Trench excavation will typically be carried out in two sections across each road to allow continued movement of traffic. Safe working widths will be required when excavating in the highway and, where insufficient width is currently available, carriageway widening and/or temporary traffic management measures may be required.

Construction Traffic Generation

29.5.22 Construction of the onshore cable route is likely to last approximately 28 months with the landfall works expected to last appoximately 8 weeks. Construction of the onshore substation will take place over approximately 24 months. This construction period will include the following phases:

- Site mobilisation and establishment of site compounds;
- Establishment of access tracks;
- Cable landfall and substation foundation construction;
- Cable route trench construction and HDD;
- Erection of substation; and
- Cabling and site commissioning.

29.5.23 The following anticipated types of traffic would require access to the working width:

- Low-loaders and HGVs to deliver equipment and plant;
- Flat-bed lorries, to deliver substation and transformer components;
- Cranes;
- Fuel tankers to supply diesel to construction plant;
- HGVs with regular deliveries of construction materials, i.e. aggregates, cables, cable ducting, slurry; and
- Private car, light van or minibus transporting construction workers.

Heavy Goods Vehicles Trip Generation - Onshore Cable Route

29.5.24 Heavy goods vehicles will be required to deliver plant, ducting, cables and materials along the whole length of the working width with additional equipment required at HDD locations.

29.5.25 Each section will require the use of tracked mechanical excavators to construct the haul roads, excavate the trenches and backfill once ducts have been laid. The plant will be delivered using low-loaders at the various access points to the working width. Deliveries associated with site establishment will take place before trench excavation commences and will include items such as fencing, hazard signs and site staff welfare facilities.

29.5.26 Aggregate will need to be imported to each section to create a haul road capable of accommodating plant and delivery of materials along the working width. It has been estimated that 15,444m^3 will be required, which will be delivered using 20 tonne trucks with a capacity of 18m^3, equivalent to 858 deliveries.

29.5.27 Stabilised bedding will need to be imported to each of the trench operations. It has been estimated that 10,602m^3 will be required, which will be delivered using 20-tonne trucks with a capacity of 18m^3, equivalent to 589 deliveries.

29.5.28 Ducting for the trench construction arrives in pallets with a total load equivalent to 2.81km in length. The construction will require approximately 360km of ducting, therefore resulting in around 130 deliveries by articulated vehicles along the length of the working width.

29.5.29 Before backfilling with topsoil, the ducting will be covered by protective cover tiles that help protect the cable route. Around 232km of protective covers tiles will be required, which will be delivered in batches of 3,000, resulting in 77 deliveries spread along the length of the working width.

29.5.30 The cables that will be pulled through the ducts once installed arrive in lengths of between 600m and 1,000m, weighing up to 27 tonnes each. The construction will require around 361 deliveries spread along the length of the working width.

29.5.31 As set out in Section 2 – Project Description, each cable section is joined within a jointing bay that will buried underground. These jointing bays will be located at regular intervals along the working width. Each jointing bay will require three jointing kits, requiring a total of 420 kits. These will be delivered in batches of 20, resulting in around 21 deliveries spread along the length of the working width.

29.5.32 HDD construction will require the establishment of a site compound at either end of the route to be drilled. The entry point, known as the HDD rig site, will have a temporary footprint of approximately 2,500m^2 and will accommodate a number of modules for messing facilities, power supplies and mud plant, offices and storage for materials and equipment, including the drilling rig.

29.5.33 The actual drilling operation requires a number of materials and equipment. The drilling rig is a 32-tonne unit that will be delivered on a low loader, while also needing a crane with a capacity of 250 tonnes. The drill pipes required for a typical 500m length will weigh around 60 tonnes in total, requiring up to three deliveries on articulated vehicles. Each HDD site also requires around 200m^3 of slurry, comprising bentonite mud and water, which is equivalent to ten 20-tonne trucks. Ducting arrives in six reels of 100m lengths on each load, requiring up to four deliveries for each HDD site.

29.5.34 Once construction plant arrives on each site it will remain there until the specific task within that section is complete. There will be a requirement for fuel deliveries and maintenance to be carried out, which will be accommodated along the haul roads.

29.5.35 It is likely that once a specific task is complete within a section, plant may be relocated to another section, thereby reducing the volume of equipment required at any one time. The four large HDD activities will be undertaken at the front end of the construction programme as these are at challenging crossings. Trenching activities will follow and it is likely that more than one trenching team will work on the route at one time.

29.5.36 Table 29.5 outlines the estimated HGV trip generation according to each section of the route based upon its length and any requirements for HDD operations. It is estimated that approximately 2,124 HGV deliveries (excluding abnormal loads) would occur during the construction of the onshore cable route. The HGV figure predominantly consists of deliveries for cable, ducting and aggregates. For the purposes of the assessment, it is assumed that all deliveries will originate from the A27, east of Shoreham, as this provides the most likely origin for materials and plant. These flows are illustrated at Appendix 29.5.

Table 29.5: Cable Construction Programme and Associated Vehicle Movements

Section	Section length (km)	Trenching Operations				HDD Operations			XLPE cable	Misc. (Fuel, etc)	Total Deliveries per Section
		Haul Road Aggregate	uPVC ducting	Stabilised Bedding	Cover Tiles	Drill pipes	Slurry	HDPE ducting			
HDD – Landfall	0.5	12	0	6	1	3	10	4	7	1	44
Trenching – section 1	1.2	36	6	26	3	0	0	0	15	2	88
HDD – railway	0.5	12	0	0	0	3	10	4	7	1	37
Trenching – section 2	1.8	54	9	39	5	0	0	0	22	2	131
HDD – A27	0.5	12	0	0	0	3	10	4	7	1	37
Trenching – section 3	1.2	36	6	26	3	0	0	0	15	2	88
Trenching – section 4	5.9	175	28	126	17	0	0	0	72	8	426
HDD– River Adur/A283	0.5	12	0	0	0	3	10	4	7	1	37
Trenching – section 5	4.5	134	21	96	13	0	0	0	55	6	325
Trenching – section 6	5	149	24	107	14	0	0	0	61	7	362
Trenching – section 7	3.9	116	18	84	11	0	0	0	48	5	282
Trenching – section 8	3.7	110	18	79	10	0	0	0	45	5	267
Total Deliveries		858	130	589	77	12	40	16	361	41	2,124

Heavy Goods Vehicles (HGV) Trip Generation - Onshore Substation

29.5.37 Construction of the substation will require deliveries of plant, materials and equipment. It is expected that a tracked mechanical excavator and a grader, arriving on low loaders, and backhoe loaders will be required during construction, together with dump trucks and tractors and trailers. A large capacity crane will be required for installation of equipment, particularly the super grid transformers. Delivery of materials will predominantly comprise of aggregate, concrete, steel and general building materials.

29.5.38 Delivery of substation equipment will be accommodated on low-loaders with four being classed as abnormal loads. These abnormal loads are detailed later in this section.

29.5.39 Table 29.6 outlines the estimated HGV trip generation in line with the construction programme. It is estimated that approximately 6,426 HGV deliveries (excluding abnormal loads) would occur during the construction of the substation.

29.5.40 Table 29.6 identifies that the most intense period of construction would be during excavation and foundation construction phases. During this period, 30 deliveries by HGVs would typically occur during each day. Over the entire construction period it is expected that, even taking into account any daily fluctuations, the maximum number of HGV deliveries into the onshore substation site in any one day will not exceed 40 vehicles. These movements would be directed along the A272 and then to proceed along Wineham Lane to the construction site. These flows are included within the figures illustrated at Appendix 29.5.

Table 29.6: Estimated HGV Deliveries during Onshore Substation Construction

Phase	Approximate HGV Deliveries	Typical Daily Deliveries	Daily HGV movements (two-way)
Enabling works (via Bob Lane)	160	16	32
Site establishment	865	23	46
Site preparation	210	7	14
Excavation and foundations	1,051	30	60
Site building works	440	10	20
Other civils	563	11	22
Site surfacing	700	5	10
Electrical plant installation	482	17	34
Miscellaneous	1,955	10	20
TOTAL	6,426	-	

Construction Worker Trip Generation - Onshore Cable Route

29.5.41 The workforce numbers required for the onshore cable route construction can vary depending on the agreed construction programme and the chosen contractor. Therefore, at this stage, it is not possible to fully determine the number of workers likely to be on site during the construction period.

29.5.42 However, for each trenching section under construction it is expected that around 15 personnel would be required for trench operations and haul road construction, 5 personnel for jointing and 3 site management personnel. Multiple trenching operations occurring at any one time will require a similar number of personnel working at each site. Specialists may also be required on site, such as archaeologists or ecologists.

29.5.43 For certain activities, in particular cable delivery and cable pulling, additional workers will be required with around 20 extra personnel expected for 2 to 3 days at a time and will be required on site once every 3 weeks.

29.5.44 Specialist engineering activities, such as the HDD operations and final testing, will require up to an additional 10 workers occasionally. Final testing will take place at the Bolney end of the cable route. Table 29.7 presents the estimated workforce during the construction of the onshore cable route for each of the identified sections and HDD locations.

Table 29.7: Estimated Workforce during Onshore Cable Route Construction

Location	Max. Daily Personnel
Main site compound	10
–Per HDD operation	10
Per trenching operation	23

29.5.45 During the construction phase of the onshore cable route, a maximum of 23 workers are expected to be on any single works site of the route at any one time. As the worst case assessment given that little detail is currently available on the phasing of construction works along the cable route a total maximum of 226 personnel on site across the entire route has been assumed should multiple sections be constructed concurrently. Although it is thought more likely that the peak workforce on the cable route will be around 100 to 150 which would easily fall within this worst case.

29.5.46 Construction personnel for specialist projects such as this are often drawn from across the country and not necessarily from local labour sources. Therefore, a large proportion usually stays in local accommodation. Experience shows that workers will also often car-share owing to limited areas of parking at construction sites, which in this case can be further supported by workers staying in accommodation close together. Based on an average car occupancy of 2 workers per vehicle, an average of 24 construction worker trips will be made to each section of the site (excluding HDD operations) each day (12 inbound, 12 outbound). These trips are likely to be made in cars, light vans and 4x4s. For the purposes of the assessment, all workers are assumed to be living in Worthing and travel to their relevant site compound each day. The resulting flows, based on an average car occupancy of 2, are illustrated at Appendix 29.6.

Construction Worker Trip Generation - Onshore Substation

29.5.47 During the construction phase of the onshore substation, the maximum number of workers expected to be on site during the peak construction period is 250. Table 29.8 presents the estimated workforce during the construction of the onshore substation over a two-year period.

Table 29.8: Estimated Daily Workforce during Onshore Substation Construction

Month	Year 1	Year 2
1	61	31
2	194	44
3	194	44
4	194	44
5	194	63
6	194	238
7	207	250
8	207	219
9	134	134
10	134	61
11	61	31
12	61	16

29.5.48 From Table 29.8 it can be deduced that a maximum of 250 workers would arrive or depart the onshore substation construction site on a single day during peak construction activity. The average numbers of workers entering the site per day would range between 15 and 60 depending on the stage of construction. These figures, based on an average car occupancy of 2, are illustrated at Appendix 29.6.

Abnormal Load Trip Generation - Onshore Cable Route

29.5.49 An abnormal load movement is defined as a vehicle in excess of 18.65m in length or 2.9m in width or 44 tonnes in weight.

29.5.50 The delivery of cables will require abnormal loads owing to the size of the cable drums and their weight, which can be up to 27 tonnes including the cable itself. Combined with the low loader the overall weight can be 52 tonnes.

29.5.51 The cable drums need to be delivered to each section of the route, together with a crane to offload onto hardstanding areas at jointing locations. The low loader that will deliver each drum will typically be up to 16.5m in length and will need to negotiate the access routes to each section. This may require some minor modifications to the highway geometry in rural areas, such as increasing corner radii at minor junctions.

29.5.52 Table 29.5 indicates that around 360 cable deliveries may be required across the whole cable route, with the section experiencing the highest volume being section 4 with 72 deliveries.

Abnormal Load Trip Generation - Onshore Substation

29.5.53 The substation equipment will include four supergrid transformers (SGT), which on delivery will be 6.5m high, 6m wide and 16m long. These abnormal loads will be delivered via the A272 and proceed along Wineham Lane to the construction site. The standard minimum turning radius for these loads is 30m and therefore modifications will be necessary to the highway geometry where this cannot be achieved at present.

Cumulative Impact of Construction Traffic

29.5.54 A number of significant developments have been identified in the area surrounding the onshore cable route which are deemed by the local planning authorities to be of sufficient significance to be included as part of a cumulative impact. These are detailed as follows:

- ADC/0287/09 (Permitted) 197 dwellings, Upper Shoreham Road;
- ADC/0191/08 (Permitted) B1/B2/B8 2,108m^2, Lancing Business Park;
- AWDM/0364/11 (Pending) Worthing College, Warren Road;
- AWDM/0205/12 (Pending) Football training ground, Mash Barn Lane, Lancing; and
- Proposed Modifications – Bolney substation.

29.5.55 Table 29.9 summarises the peak increases in traffic during construction together with the cumulative effect from the above developments and describes their sensitivity in terms of the increase in traffic volumes. The cumulative baseline flows are illustrated in Appendix 29.7, while the total construction traffic flows, including the percentage impact, are illustrated at Appendix 29.8.

Table 29.9: Peak Increases in Traffic

Location	AADT	Assumed AADT HGV %	Cumulative Development	Rampion Construction Traffic (% Impact)	Rampion HGV Traffic (% Impact)	Sensitivity
A259 – between B2223 and Western Road	35,424	7.5%	175	58 (0.2%)	24 (0.9%)	Low
Western Road	11,815	7.5%	n/a	72 (0.6%)	38 (4.3%)	Low
A27 – west of Sompting Road	41,393	15%	528	448 (1.1%)	0 (0.0%)	Low
A27 – between A2025 and A283	57,432	15%	190	512 (0.9%)	122 (1.4%)	Low
A27 – east of A283	69,109	15%	48	318 (0.5%)	318 (3.1%)	Low
A283 – between A27 and A2037	21,811	7.5%	n/a	418 (1.9%)	78 (4.8%)	Low
Edburton Road	1,760	7.5%	n/a	94 (5.3%)	60 (45.5%)	Low
A2037 – between A283 and A281	8,059	7.5%	n/a	298 (3.7%)	0 (0.0%)	Low
A281 – between A2037 and A23	8,246	7.5%	n/a	0 (0.0%)	0 (0.0%)	Low
B2116 – between Wineham Lane and A23	3,808	7.5%	n/a	70 (1.8%)	46 (16.1%)	Low
Wineham Lane – between A272 and B2116	1,014	7.5%	98	398 (35.8%)	124 (163%)	Medium

Location	AADT	Assumed AADT HGV %	Cumulative Development	Rampion Construction Traffic (% Impact)	Rampion HGV Traffic (% Impact)	Sensitivity
A272 – between Wineham Lane and A23	16,132	7.5%	98	124 (0.8%)	124 (10.2%)	Low

29.5.56 Based on the derived sensitivities of the links identified in Table 29.9, only Edburton Road and Wineham Lane are considered to accommodate sufficient levels of additional traffic and/or HGVs to justify further assessment of impacts.

Upgrades to the Adopted Highway

29.5.57 It is proposed that deliveries will use the local highway network to arrive at site compounds and material storage areas. These will be located adjacent to or close as possible to the public highway. Limited improvements may be necessary to accommodate deliveries, particularly where large articulated vehicles are used on rural lanes and for the use of abnormal load vehicles.

Potential Effects

29.5.58 The increases in construction traffic have the potential to result in the following environmental impacts:

- **Traffic noise and vibration:** The potential traffic noise impact on residential receptors in the vicinity of the site would be temporary in nature and very small scale given the distance from receptors. This is considered further in Section 27 (Noise and Vibration).

- **Severance:** The effect of severance is the perceived division that can occur within a community when it becomes separated by a major traffic artery. It may result from the difficulty of crossing a heavily trafficked road, for example. The IEA guidelines suggest that only changes in traffic flows of 10% or more are likely to produce changes in severance. In this case, the threshold would only be exceeded along Wineham Lane. However, the affected sections of road are largely pedestrian free with only occasional pedestrian movements. This represents an impact of negligible magnitude on a receptor of medium sensitivity resulting in a not significant impact.

- **Congestion and driver delay:** Delays to non-development traffic can occur on the network due to additional traffic generated by a development. The Institute of Environmental Assessment (IEA) guidelines note that these additional delays are only likely to be significant when the traffic on the network in the study area is already at, or close to, the capacity of the system. Normal fluctuations in traffic flows are expected up to 10% and therefore only increases in traffic above this threshold are likely to cause additional congestion. In this case, the only link where this threshold is exceeded is Wineham Lane. However, the affected sections of road will continue to operate significantly below their theoretical link capacity and are therefore unlikely to result in congestion problems. This represents an impact of low magnitude on a receptor of medium sensitivity resulting in a not significant impact.

- **Increased risk of accidents:** Any increase in traffic numbers has the theoretical potential to increase the risk of accidents. Ordinarily, marginal increases in vehicle numbers would be considered to have a negligible effect on safety since the increases are within average day to day variations in traffic levels. However, there is potential for impacts on safety as a consequence of driver frustration related to the movement of abnormal loads. Furthermore, the design of temporary construction accesses needs to accommodate the easy movement of construction vehicles entering and exiting the construction site to avoid unsafe manoeuvring on the highway. This represents an impact of medium magnitude on a receptor of up to medium sensitivity resulting in a moderate significant impact.

- **Intimidation and pedestrian delay:** Changes in the volume, composition or speed of traffic may affect the ability of pedestrians to cross the road or affect the scale of fear and intimidation experienced by pedestrians. The IEA guidelines suggest that only changes in HGV traffic flows of 100% or more are likely to result in significant changes in fear and intimidation. In this case, the only links where this threshold is exceeded are Wineham Lane and Edburton Road. However, the affected sections of road are largely pedestrian free with only occasional pedestrian movements. This represents an impact of negligible magnitude on a receptor of up to medium sensitivity resulting in a not significant impact.

- **Dust and dirt:** HGVs have the potential to distribute dust and dirt from the construction site onto the local highway network. These effects would be most pronounced in the immediate vicinity of the site entrances. The potential for road soiling to occur would already be controlled by standard appropriate measures, such as wheel cleaning and road sweeping. This represents an impact of low magnitude on a receptor of up to medium sensitivity resulting in a not significant impact.

- **Hazardous loads:** It is not anticipated that the construction process will require carriage of material listed in The Carriage of Dangerous Goods in the UK. If these materials become needed during the course of construction, the legal requirements associated with their transit will be enforced.

Impacts During Operation

29.5.59 During the operation of the cable route periodic testing of the cable over-sheath (every 2–5 years), is likely to be required. This will require access to the link boxes (located in underground pits) along the cable route. This may require attendance by up to three vehicles per day, typically light vehicles such as vans, in any one location and they will use existing field accesses to reach relevant sections of the route.

29.5.60 The substation will be designed to be unmanned during operation. There will be some maintenance visits. This would constitute a very small number of light vehicles for maintenance of the substation. In addition, there may be the occasional HGV for replacement of equipment, when necessary.

29.5.61 These traffic movements would fall substantially below the IEA guidelines for significance and would be well within normal daily variations. Hence, traffic movements associated with the operational phase of the onshore works are considered to be 'not significant'.

29.5.62 Permanent vehicular access to the substation will be provided in the form of an access track from Bob Lane. The substation will be designed to be unmanned and thus the permanent access will be used for routine service and maintenance activities.

Impacts During Decommissioning

29.5.63 At decommissioning it is anticipated that the onshore cables will be left buried in situ, unless removed to be replaced by new cables to be run along the same route ducting as part of future developments or wind farm repowering. It is likely that ducting will remain in place; however, the cables may be pulled out of the ducts via the jointing bays. If the cables are removed, residual impacts on the physical environment would be of smaller scale than impacts described in this section for construction as works would only occur at specific locations.

29.5.64 No decision has been made regarding the final decommissioning policy for the proposed substation, as it is recognised that industry best practice, rules and legislation change over time and therefore the methodology cannot be finalised until immediately prior to decommissioning. The onshore substation may continue to be used as a substation site after the Project has been decommissioned. It is possible that the substation will be upgraded for use by future offshore renewable developments. The decommissioning methodology cannot be finalised until immediately prior to decommissioning. A transport assessment of the required works will be required to identify the impacts appropriate at that time.

29.6 Mitigation Measures

29.6.1 Appropriate mitigation measures for the reduction and potential elimination of the potential impacts are described below.

During Construction

Construction Access

29.6.2 The construction of the onshore cable route will require a number of temporary construction accesses, potential locations of which have been indicated earlier in this section. These will be designed to accommodate the swept path of all construction vehicles that need to enter the construction area for each specific section. This will avoid any potential delays to traffic on the highway network and reduce the risk of accidents due to vehicles manoeuvring.

29.6.3 The construction of the onshore substation will also require a construction access. A temporary construction access will be created from a new bellmouth with Wineham Lane into private land situated directly north of the National Grid boundary. This approach mitigates the requirement for HGVs traversing down Bob Lane during the construction period, except for the initial enabling works to create the temporary Wineham Lane construction access.

29.6.4 Details of the siting, design and layout of temporary construction accesses will be agreed with the relevant highway authority before works commence.

Construction Methods

29.6.5 The trenching operations that will occur across the majority of roads and accesses that the cable route encounters will include traffic management measures. It is likely that single-file working will be used and therefore temporary traffic lights or 'Stop/Go' boards will be utilised, depending on the volume of traffic on each road.

General Construction Traffic

29.6.6 A Travel Plan will be implemented, sitting with an overarching Traffic Management Plan, which would encourage the use of more sustainable forms of transport and, where this may not be possible, to increase car-sharing. Recommended initiatives include the use of minibuses to pick up construction workers from designated points around Worthing and Shoreham.

29.6.7 The Travel Plan will aim to minimise the use of private vehicles for travelling to the working width and, where such journeys are necessary, to reduce the number of vehicles by encouraging car sharing. Overall, the Travel Plan will minimise the number of vehicle trips associated with construction workers.

Abnormal Loads

29.6.8 Subject to approval with the relevant highways authorities, the abnormal load movements may be undertaken outside of peak traffic hours and, if required, could pull over to the side of the road at a suitably safe location to allow other road users to overtake, thereby minimising driver delay. Some minor roads may also need to be closed temporarily while an abnormal load passes along it due to the width of the load. Such mitigation will be agreed within a Traffic Management Plan with the relevant highway authorities prior to the works.

29.6.9 To accommodate the swept path of abnormal loads, some minor geometric improvements may be necessary at junctions. These are likely to be limited to minor roads in rural areas where verges are only grassed.

During Operation

Maintenance Traffic

29.6.10 The impact of operational traffic on the local road network is deemed to be not significant and therefore no mitigation measures are considered necessary.

Maintenance Access

29.6.11 The onshore cable route will require minimal maintenance with only occasional inspections of jointing boxes along the route. Access to these is expected to be via existing field accesses using 4x4 type vehicles.

29.6.12 The onshore substation will require permanent access, which will be designed to accommodate all likely maintenance vehicles. The access will be constructed at Bob Lane, using an existing farm track that will be improved to accommodate vehicles for routine maintenance and service activities.

During Decommissioning

29.6.13 As no decision has been made regarding the final decommissioning policy for the proposed substation, no mitigation can be identified at this stage. A transport assessment of the required works will be required to identify the impacts appropriate at that time. No mitigation will be necessary for the decommissioning of the cable route if it remains in situ.

29.7 Residual Effects

29.7.1 A detailed summary of residual effects (following implementation of the mitigation measures identified in the assessment) and their significance is provided in Table 29.10.

Table 29.10: Summary of Impacts, Mitigation Measures and Residual Effects

Aspect	Sensitivity of Receptor	Magnitude of Impact	Proposed Mitigation Measures	Residual Effect
Impacts During Construction				
Severance	Medium	Negligible	None required	Not significant
Congestion and driver delay	Medium	Low	Traffic Management Plan	Not significant
Pedestrian delay	Medium	Low	None required	Not significant
Road safety	Medium	Medium	Design of temporary accesses to accommodate all relevant types of construction vehicle and abnormal loads. Traffic Management Plan for abnormal load movements.	Not significant
Dust and dirt	Medium	Low	None required	Not significant
Impacts During Operation				
Road safety	Medium	Medium	Design of permanent substation access to accommodate all types of maintenance vehicle.	Not significant
Impacts During Decommissioning				
None identified	-	-	-	-

29.8 References

Department of Energy and Climate Change, July 2011, *Overarching National Policy Statement for Energy (EN-1)*.

Department for Communities and Local Government, March 2012, *National Planning Policy Framework*.

Institute of Environmental Assessment (IEA), 1993, *Guidelines for the Environmental Assessment of Road Traffic*.

Department for Transport, March 2007, *Guidance on Transport Assessment*.

West Sussex County Council, March 2011, 'West Sussex Transport Plan 2011–2026'.

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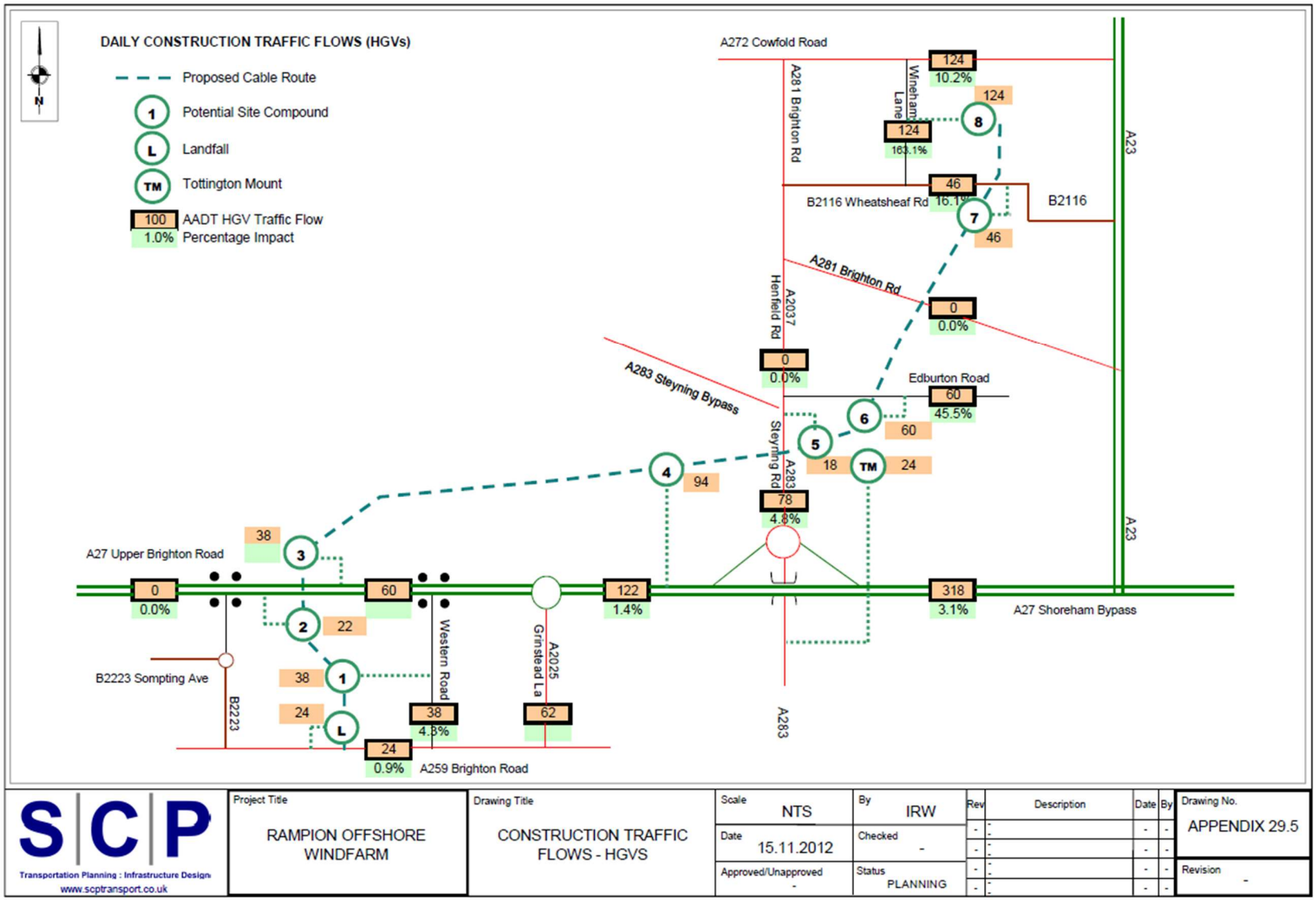

S C P Transportation Planning : Infrastructure Design www.scptransport.co.uk	Project Title: RAMPION OFFSHORE WINDFARM	Drawing Title: CONSTRUCTION TRAFFIC FLOWS - HGVS	Scale: NTS	By: IRW	Rev / Description / Date / By			Drawing No.: APPENDIX 29.5
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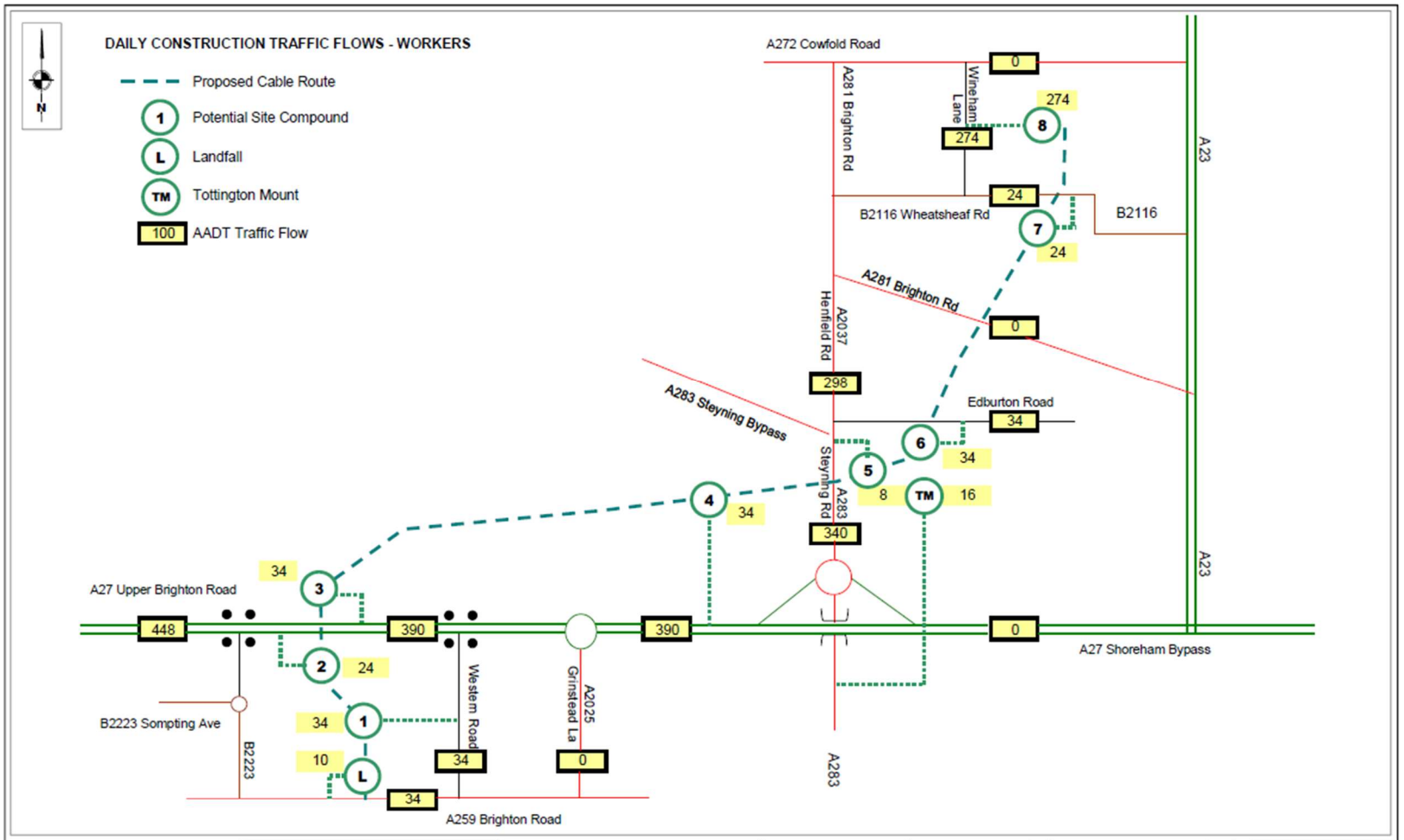
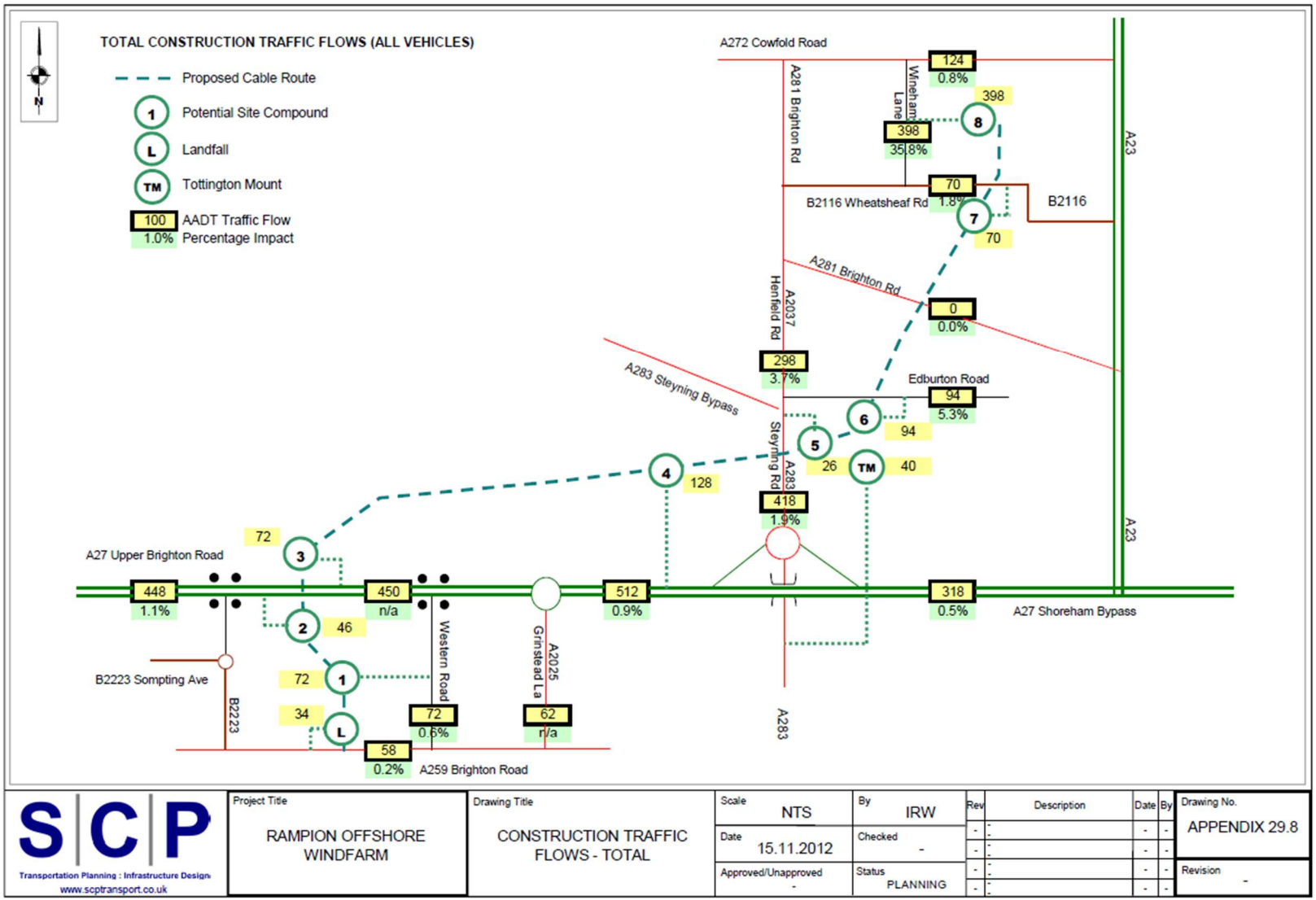
			Approved/Unapproved: -	Status: PLANNING				Revision: -

Appendix 29-6



SCP Transportation Planning : Infrastructure Design www.scptransport.co.uk	Project Title: RAMPION OFFSHORE WINDFARM	Drawing Title: CONSTRUCTION TRAFFIC FLOWS - WORKERS	Scale: NTS	By: IRW	Rev	Description	Date	By	Drawing No.: APPENDIX 29.6
			Date: 30.10.2012	Checked: -	-	-	-	-	
			Approved/Unapproved: -	Status: PLANNING	-	-	-	-	Revision: -

Appendix 29-8



Appendix 3-Assessment of Enso Energy Kent Street Traffic data:

In REP4-072, item 7a), Rampion say:

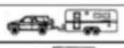
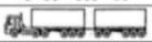
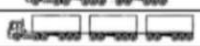
"In response to comments made by Cowfold v Rampion about the source of the traffic data used, the Applicant noted that it is correct that it had used traffic data from the Enso Energy Battery Storage Construction Traffic Management Plan to inform its strategy in addition to the surveys which had recently been completed on behalf of the Applicant. In relation to these recently conducted traffic surveys, the Applicant clarified that it had been let down by its supplier and so these had been delayed. In relation to Cowfold v Rampion's query about whether the vehicle types recorded in the data were correct, the Applicant confirmed that is confident numbers provided and that it had excluded days when the A272 was closed to avoid skewing the data. The Applicant noted that the Enso data categorises any vehicles ***over*** *7.5 tonnes as Class 1."* This must surely be a mistake?

We have previously raised concerns about this traffic survey. We agree that the numbers are likely to be correct, but *not* the interpretation. Below we set out why we believe Rampion are overestimating the current HGV usage of Kent Street and provide a further clarification of why the Enso Streetwise data is not fit for purpose, as it has been manipulated to appear that the baseline usage includes a much higher number of heavier vehicles:

The Streetwise data is taken from the Enso Energy CTMP from its application to Horsham District Council

https://iawpa.horsham.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=2129BB17BC58420A9CD511AB6ACBC278

Transport Planning Associates advise that the classifications used by Streetwise are likely to mirror classes 1 to 13 below:

Class		Axles	Groups	Description	Parameters	Dominant Vehicle	Aggregate
1	SV	2	1 OR 2	Short - Car, light Van	d(1)>=1.7m, d(1)<=3.2m & axles=2		Light
2	SVT	3, 4 OR 5	3	Short Towing - Trailer, Caravan, Boat, etc.	groups=3, d(1)>=2.1m, d(1)<=3.2m, d(2)>=2.1m & axles=3,4,5		
3	TB2	2	2	Two axle truck or Bus	d(1)>3.2m & axles=2		Medium
4	TB3	3	2	Three axle truck or Bus	axles=3 & groups=2		
5	T4	>3	2	Four axle truck	axles>3 & groups=2		
6	ART3	3	3	Three axle articulated vehicle or Rigid vehicle and trailer	d(1)>3.2m, axles=3 & groups=3		Heavy
7	ART4	4	>2	Four axle articulated vehicle or Rigid vehicle and trailer	d(2)<2.1m or d(1)<2.1m or d(1)>3.2m axles = 4 & groups>2		
8	ART5	5	>2	Five axle articulated vehicle or Rigid vehicle and trailer	d(2)<2.1m or d(1)<2.1m or d(1)>3.2m axles = 5 & groups>2		
9	ART6	>=6	>2	Six (or more) axle articulated vehicle or Rigid vehicle and trailer	axles=6 & groups>2 or axles>6 & groups=3		
10	BD	>6	4	B-Double or Heavy truck and trailer	groups=4 & axles>6		
11	DRT	>6	5	Double road train or Heavy truck and two trailers	groups=5,6 & axles>6		
12	TRT	>6	>6	Triple road train or Heavy truck and three (or more) trailers	groups>6 & axles>6		
14	M/C	2	1 OR 2	Motorcycle	d(1)>=1.18m, d(1)<=1.7m & axles=2		Light
15	CYCLE	2	1 OR 2	Cycle	d(1)<1.18 & axles=2		

Source: Kestral Surveys

The data for Kent Street Southbound on Wednesday 18th October, as an example, is shown below. (page 25 of Enso document) We do not dispute this:

Channel - Southbound

Wednesday 18/10/2023		Vehicle Classes													
Hour	Min	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
7	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
8	0	6	1	0	0	0	0	0	0	0	0	0	0	0	7
9	0	6	0	0	0	0	0	0	0	0	0	0	0	0	6
10	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
11	0	4	3	0	0	0	0	0	0	0	0	0	0	0	7
12	0	4	2	0	0	0	0	0	0	0	0	0	0	0	6
13	0	3	1	0	2	0	0	0	0	0	0	0	0	0	6
14	0	6	2	0	0	0	0	0	0	0	0	0	0	0	8
15	0	4	3	0	0	0	0	0	0	0	0	0	0	0	7
16	0	5	1	0	0	0	0	0	0	0	0	0	0	0	6
17	0	6	0	0	0	0	0	0	0	0	0	0	0	0	6
18	0	5	0	0	0	0	0	0	0	0	0	0	0	0	5
19	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
20	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
21	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
22	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
23	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hour Ranges:	7-19	53	16	0	2	0	0	0	0	0	0	0	0	0	71
	6-22	57	16	0	2	0	0	0	0	0	0	0	0	0	75
	6-24	57	16	0	2	0	0	0	0	0	0	0	0	0	75
	0-24	57	16	0	2	0	0	0	0	0	0	0	0	0	75

The figures beyond Class 2 are much the same for any of the days shown, ie a very low number of largely class 4 vehicles.

However, Streetwise then goes on to display this same data as OGV1 and OGV2 classifications. (page 29):

Channel - Southbound

Vehicle Class

Classes / Day / Time	Car / LGV / Caravan - 1	OGV1 / Bus - 2,3,5,6,7,12	OGV2 - 4,8,9,10,11,13	TOTAL - 1-13
18/10/2023				
7-19	53	16	2	71
6-22	57	16	2	75
6-24	57	16	2	75
0-24	57	16	2	75
19/10/2023				
7-19	90	33	0	123
6-22	99	34	0	133
6-24	99	34	0	133
0-24	99	34	0	133
20/10/2023				
7-19	337	47	1	385
6-22	368	47	1	416
6-24	368	47	1	416
0-24	368	47	1	416
21/10/2023				
7-19	535	69	0	604
6-22	556	71	0	627
6-24	557	71	0	628
0-24	579	78	0	657
22/10/2023				
7-19	181	11	0	192
6-22	181	11	0	192
6-24	182	12	0	194
0-24	182	12	0	194
23/10/2023				
7-19	55	14	1	70
6-22	59	14	1	74
6-24	61	14	1	76
0-24	61	14	1	76
24/10/2023				
7-19	69	17	0	86
6-22	71	17	0	88

You will see that although the numbers are correct within each division, (57 class1, 25 OGV1, 2 OGV2), **all** the OGV1 vehicles are actually from the lowest classification within this group ie Class2, which, from the table above is a light weight, 2 axle short towing trailer or caravan. Most likely in this case to be a horse box. This is certainly not comparable to the HGVs Rampion will be bringing down the lane, which will be represented by some of the other classifications in the OGV1 group. Similarly, the OGV2 group covers vehicles all the way up to the enormous low loaders they will be using, but the only vehicles in this group which **actually** appear on the data are just 2 class 4 vehicles ie a medium weight, 3 axle truck or bus, probably therefore large horse boxes. The grouping in to OGV1 and 2 is therefore completely misleading, possibly deliberately so.*

We would add that none of the many cyclists we know use this lane were recorded (class 15), as one detector cannot work at both extremes, hence the need for a Non-Motorised User survey.

Also, this data shows that we were right to question Rampion's assessment of the percentage increase in HGVs on this tiny lane, as the baseline number is **not** the combined number of OGV 1+2 vehicles but simply the OGV2 vehicles, ie 0-2, meaning the percentage increase in HGVs is well over 1000%, as table 2-1 from the Applicant's Response to AP 46 and 57 shows peak week HGV figures of 28 in each direction (ie 56 total movements).

Finally, we do not understand why the Applicant should say they have been let down by their suppliers regarding their own traffic survey, as a traffic survey was carried out before ISH2 so why has it not been reported? Could it be because the information in it is not to their liking?

*With regard to the OGV classifications, these are set out within the Design Manual for Roads and Bridges CD224

https://www.standardsforhighways.co.uk/tses/attachments/257e5888-2bfd-492d-92d4-ecf7d40428b0?inline=true

Appendix 4- Rampion letter to Affected Party PCM Unique reference number 070

Carter Jonas

3 Royal Court
Kings Worthy
Winchester
Hampshire
SO23 7TW

[redacted]

Your ref:
Our ref: WSX311740

16th April 2024

[redacted]

SUBJECT TO CONTRACT AND WITHOUT PREJUDICE
RAMPION EXTENSION DEVELOPMENT LTD (RED)

I am writing following instructions from Rampion Extension Development Ltd (RED) to act on their behalf in relation to negotiations concerning voluntary acquisition of rights required for the project.

In order to provide RED with an electrical connection from the proposed Rampion 2 offshore wind farm to the National Grid substation at Bolney, RED wish to acquire the rights to construct and maintain an onshore transmission cable (or cables).

To do this RED require a permanent easement extending up to 5 meters for permanent access rights, which is shown by the area outlined red on the attached plan ref J0039831-24-22A, to the cable easement.

RED have submitted an application under the Planning Act 2008 to the Planning Inspectorate for a Development Consent Order (DCO) to progress this project. If this application is successful, this will give RED powers of compulsory acquisition for the sufficient rights required to build the scheme and associated connections and access rights. Rather than relying on compulsion RED would prefer to secure these rights by private treaty.

I attach therefore proposals for an Option Agreement that my client would like to enter into that will grant them the rights required over your land thereafter. The Heads of Terms for the proposed Option and Deed of Easement are enclosed with this letter. The 10% Option Fee, payable on signing of the Option Agreement is outlined within the enclosed Heads of Terms.

The indicative length of the access route on your land extends to approximately 5 meters which will therefore attract payments as follows:

Easement Amount:	£500 (Minimum Payment)
Option Payment (made on exchange):	£50 (10%)
Easement Payment (on completion):	£450 (90%)

There will be an additional incentive payment consisting of 10% of the Easement Amount set out below if the Key Terms document is signed and returned within 6 weeks from the date of this letter comprising thus:

Easement Amount:	£550 (Minimum Payment)
Option Payment (made on exchange):	£55 (10%)
Easement Payment (on completion):	£495 (90%)

Should you have any queries or wish to discuss this further please do not hesitate to contact me.

I have also enclosed an extract from the Onshore Works Plans for your reference, so that you can see your property in the context of the wider scheme.

Yours sincerely

[redacted]

Nigel Abbott BSc (Hons) MRICS
Associate Partner

[redacted]@carterjonas.co.uk

Rampion 2 WIND FARM

Carter Jonas

Key Terms for an Operational Access Land Option and Deed of Easement for the Rampion 2 Extension Development

Confidential and Subject to Contract

NOTE TO AGENTS AND LEGAL ADVISERS: this is intended to be a summary of key commercial terms of the Option and Deed of Easement

[redacted]WSX311740	
Grantor	[redacted]
Grantor's Property	[redacted] To include land as edged Red on the attached plan.
Grantor's Agent	[Name and Address]
Grantor's Solicitor	[Name and Address]
Occupier	If Required
Occupier's Solicitor	If Required
The Project	The Rampion 2 Offshore Windfarm Project
Grantee	Rampion Extension Development Ltd (RED), Windmill Hill Business Park, Whitehill Way, Swindon, Wiltshire SN5 6PB
Grantee Agent	Carter Jonas, 3 Royal Court, Kings Worthy, Winchester SO23 7TW
Grantee Solicitor	Eversheds Sutherland, 1 Callaghan Square, Cardiff CF10 5BT

Overview	
Key Terms	This document sets out the Key Terms to be included within an Option Agreement for a Deed of Easement for an Operational Access should the Operational Access Land be required for inclusion as part of the Project.
Option	RED will seek to enter into an Option Agreement with the Grantor for the grant of a Deed of Easement giving it rights to use the Operational Access Land to access the adjacent Rampion 2 Project should it require to do so. The initial Option Period is 5 years, subject to extension (see below). Should the Project require the use of the Operational Access Land, RED will rely upon the rights in the Option in order to enter the land to carry out any necessary Project works. The Option is exercisable by the service of a written notice with completion of the Deed of Easement 20 days thereafter.

Restrictions	The Grantor will provide various covenants including: • not to permit any new/renewal lettings without Grantee's consent, during the Option period (consent not to be unreasonably withheld or delayed where the letting will not interfere with the Grantee's project or application for any consent); • not to do anything upon the Grantor's Property which may interfere with or cause damage to the Operational Access Land or interfere with the Grantee's access; • not to erect any building or structure or allow any plant or tree to grow in the Operational Access Land; • not to raise the level of the surface of the Grantor's Land in the Operational Access Land; • not to carry out works or excavations which may endanger the stability, safety or integrity of the Operational Access Land. The above list of rights is not exhaustive. Further information will be in the legal documents.

In order to qualify for the Incentive Payment please sign and return this document together with details of your advisors in order to allow RED to progress the Option.

The Incentive Payment is conditional upon the Grantor not making or supporting any objection to the Grantee's application for Development Consent after the date on which these Key Terms were signed, and any existing objection on the part of the Grantor being withdrawn forthwith.

Signed on behalf of Grantor: .....

Name(s) of signatory .....

Dated: .....

Grantor's Agent	Name and Address
Grantor's Solicitor	Name and Address


The Old Dairy
Hillingdon
DRAGONS LANE
Dragons Farm


N
Key
Works Area Descriptions
NOTES